

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>CASE. NO. 21-CR-226-CRC</b>
	:	
	:	
<b>CHRISTOPHER MOYNIHAN,</b>	:	
	:	
<b>Defendant</b>	:	

**JOINT STATUS REPORT AND MOTION TO CONTINUE**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, and Defendant, by and through his attorney, Assistant Public Defender Sabrina Shroff, (collectively, “the Parties”), respectfully submit this status report, as directed by the Court, and state as follows:

1. On March 17, 2021, the defendant was indicted and charged with Obstruction of an Official Proceeding and Aiding and Abetting, in violation of 18 U.S.C. § 1512(c)(2) and 2; Entering and Remaining in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(2); Entering and Remaining on the Floor of Congress, in violation of 40 U.S.C. § 5104(e)(2)(A); Disorderly Conduct in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(G).

2. The defendant has been out on bond since his initial arrest on February 25, 2021. Defendant remains compliant with conditions of release.

3. The parties appeared for a video status conference on August 4, 2021 and agreed to

exclude time from The Speedy Trial Act calculation until October 5, 2021. The Court granted the joint request and tolled the speedy trial clock until October 5, 2021.

4. On August 25, 2021, in recognition of the current high rate of transmission of the Delta variant in the District of Columbia, Chief Judge Howell issued Standing Order 21-47, limiting the number of jury trials that may be conducted at one time until at least October 31, 2021 and prioritizing trials with detained defendants. Further, the Court found that “for those cases that cannot be tried consistent with those health and safety protocols and limitations, the additional time period from August 31, 2021 through October 31, 2021 is excluded under the Speedy Trial Act as the ends of justice served by the continuances to protect public health and safety and the fair rights of a defendant outweigh the best interest of the public and any defendant’s right to a speedy trial, pursuant to 18 U.S.C. 3161(h)(7)(A).”

5. Since the last status, the government has produced additional discovery and has filed a Memorandum Regarding Status of Discovery as of September 14, 2021 (ECF 20). Discovery in this matter is ongoing.

6. Parties are agreed to a 60-day continuance of this matter and to excluding related time from the Speedy Trial Act.

7. For the foregoing reasons, the parties jointly request that the status conference scheduled for October 5, 2021, be continued for 60 days, to a date and time convenient to the Court, and that the Speedy Trial clock be tolled until the next status conference.

Respectfully submitted,

CHANNING D. PHILLIPS  
Acting United States Attorney  
D.C. Bar No. 415793

/s/

ROBERT JUMAN  
Assistant United States Attorney  
Bar No. NJ 033201993  
United States Attorney's Office, Detailee  
555 Fourth Street, N.W.  
Washington, DC 20530  
Phone: (786) 514-9990

/s/

Sabrina P. Shroff  
Assistant Federal Public Defender  
Office of the Federal Public Defender  
for the District of Columbia  
625 Indiana Avenue, N.W.  
Washington, D.C. 20004  
202.208.7500 ext 130 (o) | 202.717.0964 (c)