

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 21-CR-47 (RDM)</b>
	:	
<b>v.</b>	:	
	:	
<b>HECTOR EMMANUEL VARGAS</b>	:	
<b>SANTOS,</b>	:	
	:	
<b>Defendant.</b>	:	

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**JOINT STATUS REPORT**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, by and through his counsel, respectfully file this Joint Status Report.

Trial in this matter is currently scheduled for May 16, 2022. A motions hearing and pretrial conference is scheduled for April 22, 2022. *See* September 28, 2021 Minute Entry.

On April 11, 2022, current counsel of record in this case entered his appearance, replacing the previously appointed attorney. On that same date, this Court ordered the parties to submit a Joint Status Report on or before April 15, 2022. *See* April 11, 2022 Minute Order.

The government continues to make voluminous discovery productions regarding the capitol breach investigation. Newly appointed counsel for the defendant needs time to review the discovery provided by the government and to the discuss that discovery with the defendant.

The parties have conferred and respectfully make a joint request that the current motions hearing, pretrial conference, and trial dates in this case be vacated.

In lieu of the currently scheduled dates in this case, the parties jointly propose the following:

September 19, 2022:	Motions/ Motions in Limine
October 21, 2022	Responses
October 28, 2022:	Replies Case-Specific Voir Dire and Proposed Jury Instructions
November 4, 2022:	Pretrial Conference
December 5, 2022:	Trial

The Courtroom Deputy Clerk has confirmed that the November 4 pretrial conference date and the December 5 trial date are available.

The government requests that the time between the date of this filing and the jointly requested November 4, 2022 pretrial conference date be excluded under the Speedy Trial Act. The ends of justice served by vacating and rescheduling the pretrial conference and trial dates in this case outweighs the best interests of the public and the defendant in a speedy trial, as a continuance will provide the parties additional time to review discovery and prepare for trial. Counsel for the defendant notes that time is properly excluded.

Respectfully submitted,

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