

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

UNITED STATES OF AMERICA

v.

MATTHEW RYAN MILLER,

Defendant.

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Case No. 21-cr-75 (RDM)

JOINT STATUS REPORT

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and A. Eduardo Balarezo, counsel for Matthew Ryan Miller (“the defendant”), hereby submit the following Joint Status Report:

Pursuant to the Court’s March 17, 2021 Minute Order, the parties conferred and submit the following:

1. The government is still in the process of providing discovery to the defendant. As the government has previously represented, the discovery is voluminous and, in conjunction with the Federal Public Defender Service, the government is working on developing a system for storing, searching, producing, and/or making available voluminous materials accumulated across hundreds of investigations, and ensuring that such system will be workable for both the government and defense.
2. With respect to Mr. Miller, the government has provided preliminary discovery to include USCP surveillance footage and other materials pursuant to the agreed upon Protective Order. The government needs additional time to provide supplementary

discovery to the defense. Upon receipt, the defense would also need time to review any supplemental discovery with the defendant.

3. Moreover, the defendant has requested a plea offer and the government is in the process of seeking approval for a plea offer for Mr. Miller.
4. The parties request to submit a follow-up Joint Status Report in approximately 45 days.
5. For the reasons outlined in the Court's March 17, 2021 Order (ECF No. 29), the parties further believe it is in the interest of justice to toll the Speedy Trial Act while the government continues to provide discovery and the parties discuss a potential pre-trial disposition of this matter. The parties thus request a tolling of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), based on the factors described in 18 U.S.C. 3161(h)(7)(B)(i), (ii), and (iv), as well as 18 U.S.C. § 3161(h)(1)(G). Therefore, the parties request an exclusion of time under the Speedy Trial Act from May 17, 2021, through the next scheduled status date.

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney

By: /s/
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