

**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 May 17, 2021 Minute Order, the parties conferred and submit the following:

1. On or about June 14, 2021, the government extended a plea offer to the defendant in this case. The plea offer remains outstanding and the defendant needs additional time to consider the offer.
2. As the Court is aware, the discovery in these matters is voluminous and the government is still in the process of providing additional discovery to the defendant. Specifically, the government has provided additional video footage and photographs to the defense, which the defense also needs time to review.
3. The parties request to submit a follow-up Joint Status Report in approximately 2 weeks.
4. For the reasons outlined in the Court’s March 17, 2021 Order (ECF No. 29) and May 17, 2021 Minute Order, 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 July 1, 2021, through the next scheduled status date.

Respectfully submitted,

CHANNING D. PHILLIPS  
Acting United States Attorney

By:

/s/  
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