

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 21-cr-367-RDM</b>
	:	
<b>JALISE MIDDLETON, and</b>	:	
<b>MARK MIDDLETON,</b>	:	
	:	
<b>Defendants.</b>	:	

**JOINT STATUS REPORT**

In accordance with the Court’s order at the September 24, 2021, status hearing in this case, the United States, Defendant Jalise Middleton, and Defendant Mark Middleton (hereinafter “the parties”) hereby file this joint status report for the purpose of updating the Court on the status of the case.

Since the September 24, 2021, status hearing, the government has made numerous productions to the defendants of discovery pertaining to the voluminous sets of data that the government collected and continues to collect in its investigation of the Capitol Breach cases. While the government has already provided the defendants with most of the discovery that is directly relevant to the defendants’ conduct and the offenses that are charged in this case, the production of materials through global discovery seeks to provide more discovery pertaining to the breach of the Capitol overall. The government’s discovery efforts remain ongoing, as more fully described in the government’s memoranda regarding the status of discovery in the Capitol Breach cases, the most recent of which was filed in this case on November 12, 2021.

Due to the voluminous nature of the materials provided to the defendants since the last status hearing, and the ongoing efforts of the government to provide additional global discovery, the defendants have requested additional time to finish reviewing those materials before deciding

whether to accept or reject the plea offers extended by the government on September 7, 2021. The government has agreed to leave the plea offers open at this time.

Wherefore, in order to provide the defendants with sufficient time to review discovery, allow the government to continue its discovery efforts, and permit the parties to continue their ongoing plea negotiations, the parties jointly request that the Court schedule a remote status hearing for approximately sixty days from now. The government also requests, with the defendants' consent, that the Court continue to toll the speedy trial clock in the interest of justice from now until the next status hearing.

Respectfully submitted,

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