

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE. NO. 21-CR-176-CJN
	:	
	:	
STEVE OMAR MALDONADO,	:	
	:	
Defendant	:	

**JOINT MOTION FOR CONTINUANCE
AND JOINT STATUS REPORT**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, and Defendant, by and through his attorney, Elizabeth Mullen (collectively, “the Parties”), respectfully request a 90-day continuance of this matter and also submit a joint status report, and state as follows:

1. On March 3, 2021, the defendant, Steve Omar Maldonado, was charged by way of indictment with (Count One) Obstruction of an Official Proceeding and Aiding and Abetting in violation of Title 18 U.S.C. §§ 1512(c)(2), 2; (Count Two) Entering and Remaining in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(1); (Count Three) Disorderly and Disruptive Conduct in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(2); (Count Four) Entering and Remaining in the Gallery of Congress in violation of Title 40 U.S.C. § 5104(e)(2)(B); (Count Five) Disorderly Conduct in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(2)(D); and (Count Six) Parading Demonstrating, or Picketing in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(2)(G). ECF 9.

2. The defendant has been out on bond since his arrest on February 12, 2021. Defendant remains compliant with conditions of release.

3. Since the defendant's arraignment on March 15, 2021, the Court has (collectively) ordered the exclusion of time from Speedy Trial calculations through August 26, 2022. The Court has also scheduled a VTC status conference for August 26, 2022 at 12:00pm.

4. As for discovery since our the last status report (Jul 29, 2022) defense counsel has been advised of Global Productions 18 to the defense Relativity workspace. As of August 18, 2022, over 2.5 million files (over 3.75 terabytes of information) have been provided to the defense Relativity workspace. These files include (but are not limited to) the results of searches of 600 digital devices and 133 Stored Communications Act accounts; 1,149 FBI FD-302s and related attachments (FD-302s generally consist of memoranda of interviews and other investigative steps); and 82,084 (redacted or anonymous) tips. As of August 22, 2022, over 30,000 files consisting of body-worn and hand-held camera footage from five law enforcement agencies and surveillance-camera footage from three law enforcement agencies and the Hilton Garden Inn have been shared to the defense evidence.com video repository. For context, the files provided amount to over nine terabytes of information and would take at least 105 days to view continuously. Additionally, case-specific discovery has been provided via USAFfx. Parties have maintained open communication to resolve potential discovery issues and remain compliant with issued protective order (ECF 16).

5. Parties are agreed to a 90-day continuance of this matter and to excluding the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq. Parties continue plea negotiations and believe this time will allow for further production and

