

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

UNITED STATES OF AMERICA	:	Case No. 21-CR-206 (RDM)
	:	
v.	:	
	:	
JONATHAN MELLIS,	:	
	:	
Defendant.	:	

JOINT STATUS REPORT

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the above defendant, by and through his counsel, David Benowitz, Esq., respectfully submit this Joint Status Report in the above-mentioned matter. In support of this Joint Status Report, the parties rely on the following points and authorities and any other such points and authorities as may be raised at any hearing on this matter.

- 1) For his alleged conduct on January 6, 2021, Mellis is charged by Indictment, *inter alia*, with Civil Disorder, in violation of 18 U.S.C. § 231(a)(3) and other related criminal offenses.
- 2) By way of this Court’s Minute Order dated October 25, 2022, directing the parties, *inter alia*, to file a further joint status report on or before November 7, 2022, informing the Court whether Defendant is withdrawing the pending motion for reconsideration of pretrial detention, ECF #27, or request that the Court set a new hearing date on the motion in light of the unavailability of defense counsel.
- 3) In that regard, undersigned counsel for the government and counsel for the defendant respectfully request that the Court set a new hearing date for the Defendant’s motion for reconsideration of pretrial detention to approximately the third or fourth week in January 2023, or whatever date is consistent with the Court’s calendar. More broadly, the parties will still be in

discussions regarding a possible non-trial disposition in this matter.

4) Further, counsel for the defendant states that because he has been in a jury trial in Virginia during the past several weeks and expects it to conclude sometime on or about the second week of December, counsel for the Defendant needs additional time to review this matter to make the appropriate determinations of this case with Mr. Mellis.

5) If granted, the parties will reach out to the Court's courtroom deputy to obtain the available date(s) for the Court and parties.

6) Accordingly, counsel for the defendant can represent that the defendant joins in this motion and further advise the Court that the defendant agrees that the Speedy Trial Clock, pursuant to the Speedy Trial Act 18 U.S. Code § 3161, should be tolled until the next hearing in this matter.

7) Wherefore, the parties give the Court this joint status report of this matter and respectfully request a hearing in this matter in the third or fourth week of January 2023 or whatever date is consistent with the Court's calendar.

Respectfully submitted,

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