## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:21-CR-350-PLF
	)	
ANTIONNE DE SHAUN BRODNAX	)	
Defendant	)	

## JOINT STATUS REPORT

COMES NOW the Defendant, Antionne De Shaun Brodnax, by and through counsel, Mary E. Maguire and with agreement of the government by and through counsel, Michael Liebman, and files the Joint Status Report pursuant to this Court's order. (ECF 47).

The parties have met and conferred and have agreed that an evidentiary hearing is required. The parties provide the following responses to the following topics:

- The government intends call two witnesses, FBI SA Matthew Heise and FBI SA
  Kenneth Shappee. It is anticipated that the direct and cross examination for each
  witness will be approximately forty-five minutes, for a total of one and a half hours.
  The government also plans to introduce audio-video evidence. The presentation of
  this evidence should take approximately 30 minutes.
- The defense does not intend to call any witnesses or offer and audio-visual evidence at the evidentiary hearing.
- 3. The parties believe that all legal arguments on the three sentencing guideline issues will take approximately 30 minutes per side, for a total of one hour. The parties believe the statutory argument concerning whether the imposition of concurrent or

- consecutive sentences for Mr. Brodnax's convictions is appropriate will take approximately 10 minutes per side for a total of 20 minutes.
- 4. The parties would prefer a "hybrid" evidentiary hearing in which the Court, counsel and all testifying witnesses would attend in-person and Mr. Brodnax would appear remotely through Zoom teleconference.
- The parties would like an opportunity to access the courtroom in advance of the hearing to coordinate all IT issues so that the presentation of evidence can run smoothly.

Respectfully Submitted,

By: \_\_\_\_/s/\_\_\_Counsel
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