

**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 November 1, 2021 Minute Order, the parties conferred and submit the following:

1. On or about September 29, 2021, the government re-extended a revised plea offer that was originally extended in August 2021.
2. The defendant has rejected the plea offer.
3. The parties are conferring with the Court regarding potential trial dates.
4. On November 10, 2021, the government obtained a superseding indictment (ECF No. 47). As a result, the defendant will be arraigned on December 3, 2021.
5. The government would like to articulate the plea and obtain the defendant’s rejection, on the record at the December 3, 2021 arraignment.
6. The government continues to provide voluminous discovery to the defense.
7. For the reasons outlined in the Court’s March 17, 2021 Order (ECF No. 29); May 17, 2021 Minute Order; July 1, 2021 Minute Order; the government’s July 12, 2021 Notice

of Status of Discovery (ECF No. 36); the July 15, 2021 Minute Order; the July 29, 2021 Minute Order; the government's August 26, 2021 Supplemental Notice of Status of Discovery (ECF No. 39); the Court's August 30, 2021 Minute Order; the government's September 14, 2021 Supplemental Notice of Status of Discovery (ECF No. 41); the Court's September 29, 2021 Minute Order; the government's November 5, 2021 Supplemental Notice of Status of Discovery (ECF No. 46); and the Court's November 1, 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. 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 December 3, 2021, through the next scheduled status date.

Respectfully submitted,

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United States Attorney

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