

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	Case No.: 21-CR-00289
PHILLIP C. VOGEL, II, and	:	
DEBRA J. MAIMONE,	:	
	:	
Defendants.	:	

**JOINT STATUS REPORT AND UNOPPOSED MOTION TO EXCLUDE TIME UNDER
THE SPEEDY TRIAL ACT**

The United States of America, through counsel, and defendants Philip C. Vogel and Debra J. Maimone, through counsel, hereby submit their May 5, 2023, Joint Status Report pursuant to the Court's April 5, 2023, Minute Entry and state as follows:

1. The defendants in this case are charged by a five-count Information with violations of 18 U.S.C. §§ 641 and 2 (Aiding and Abetting the Theft of Property—\$1,000 or Less); 18 U.S.C. § 1752(a)(1) (Entering and Remaining in a Restricted Building); 18 U.S.C. § 1752(a)(2) (Disorderly and Disruptive Conduct in a Restricted Building); 40 U.S.C. § 5104(e)(2)(D) (Violent Entry and Disorderly Conduct in a Capitol Building); 40 U.S.C. § 5104(e)(2)(G) (Parading, Demonstrating, or Picketing in a Capitol Building).

2. The Defendants and the government have engaged in good faith negotiations to resolve the matter, and the parties have reached an agreement to enter pleas in this case. The parties propose the court set a plea hearing date for both defendants. After reviewing their trial schedules, counsel propose the plea hearing be set on June 1, 2023, (except for 1:00 – 2:00 p.m.) if the Court is available on that date, or on another date convenient to the Court.

3. The United States and defendants through their counsel further request that the Court exclude all time between today and the date of the scheduled plea hearing from calculation under the Speedy Trial Act.

Respectfully submitted,

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