

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

UNITED STATES OF AMERICA	:	
	:	
	:	
v.	:	Case No. 21-cr-00053 (CJN)
	:	
EDWARD JACOB LANG,	:	
	:	
Defendant.	:	

JOINT STATUS REPORT

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and counsel for Edward Jacob Lang (“the defendant”), hereby submit the following Joint Status Report:

1. On September 15, 2021, the government obtained a superseding indictment that charges the defendant in Counts One and Two with violation of 18 U.S.C. §§ 111(a)(1) and 2; in Counts Three and Four with violation of 18 U.S.C. § 111(a)(1); in Counts Five, Six and Seven with violation of 18 U.S.C. § 111(a)(1) and (b); in Count Eight with violation of 18 U.S.C. § 231(a)(3); in Count Nine with violation of 18 U.S.C. §§ 1512(c)(2) and 2; in Count 10 with violation of 18 U.S.C. §§ 1752(a)(2) and (b)(1)(A); in Count Eleven with violation of 18 U.S.C. § 1752(a)(4) and (b)(1)(A); in Count Twelve with violation of 40 U.S.C. § 5104(e)(2)(D), and in Count Thirteen with violation of 40 U.S.C. § 5104(e)(2)(F). ECF 36.
2. The United States extended a formal plea offer to the defendant in June, 2021. The defendant rejected the offer. This Court has scheduled the defendant’s trial for January 9, 2023. *See* Minute Entry for proceedings held on April 5, 2022.

3. On April 5, 2022, the defendant filed a motion to dismiss Count Nine of the superseding indictment. ECF 54. The United States filed a response in opposition. ECF 55. The defendant has filed a reply. ECF 57.
4. The United States continues to provide discovery to the defense that is not case-specific as part of its effort to make global disclosures arising from the breach of the United States Capitol on January 6, 2021.
5. The parties have been able to confer and have prepared a proposed scheduling order, attached hereto, that includes dates for filing certain motions.
6. The parties believe it is in the interest of justice to toll the Speedy Trial Act and seek the exclusion of time from calculations under the 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) and (iv). Therefore, the parties request an exclusion of time under the Speedy Trial Act from April 5, 2022, until January 9, 2023.

Respectfully submitted,

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By:

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