

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	21-cr-498 (CJN)
	:	
ANDREW TAAKE,	:	
	:	
Defendant.	:	

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

The United States, by and through the United States Attorney, and defendant Andrew Taake, by and through his attorneys, Nicholas Madiou, Esq. and Michael Lawler, Esq., hereby submit this joint status report and request that the Court schedule this case for a status conference in two weeks. The United States further moves this Court to exclude the time from the date this Court enters an Order on this motion through and including the next hearing in this matter under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). The parties state as follows:

CURRENT CASE STATUS

As this Court is aware, the defendant is charged via indictment with felony and misdemeanor offenses related to crimes that occurred at the United States Capitol on January 6, 2021.

The Government and counsel for the defendant are still engaged in negotiations regarding a potential plea agreement. At the last conference in this matter on August 25, 2023, the Court

ordered the parties to file as a Status Report on September 8, 2023 regarding whether this case may be resolved without the reinstatement of Count 2 (18 U.S.C. § 1512) of the Superseding Indictment. The parties have hope that they will be able to do so but require additional time to work out the terms of a new plea agreement. The parties believe that two additional weeks would be sufficient. Should the Court grant this request and the parties then come to a resolution before the status conference, the parties will move for the status conference to be converted to a change of plea hearing.

Government counsel notified defense counsel of the filing of this status report and motion. Defense counsel joins on behalf of their client as to the status report and the request for the exclusion of time.

WHEREFORE, the Government respectfully requests that this Court schedule this matter for a status conference in two weeks. The Government further requests that the Court exclude the time from the date this Court enters an Order on this motion through and including the next hearing in this matter under the Speedy Trial Act.

Respectfully submitted,

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