

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-79-BAH
	:	
KEVIN JAMES LYONS,	:	
	:	
Defendant.	:	

**JOINT STATUS REPORT REGARDING STIPULATED TRIAL
& JOINT MOTION REGARDING TRIAL DEADLINES**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and Kevin Lyons, by and through his counsel (collectively, “the parties”), file this joint status report regarding the parties’ agreement to conduct a stipulated trial.

The parties have agreed to conduct a stipulated trial in lieu of a traditional trial by jury. The parties have so agreed because a stipulated trial will (1) conserve the Court’s and the parties’ resources by avoiding the time and effort of putting on a fulsome trial by jury, (2) preserve the defendant’s appeal rights with respect to the 18 U.S.C. § 1512(c)(2) charge, and (3) afford defendant the benefit of credit for acceptance of responsibility in the calculation of his Sentencing Guidelines ranges.

Therefore, the parties respectfully request the Court’s permission to, on or before December 9, file the government’s proposed statement of facts for stipulated trial, to which defendant will have agreed, and defendant’s agreement and waiver of jury rights.

In addition, the parties respectfully move the Court to (1) vacate the scheduling order that the Court issued on October 13, 2022 and (2) schedule the stipulated trial to occur on December 16, December 19, or December 20.

Respectfully submitted,

MATTHEW M. GRAVES
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DATED: December 2, 2022

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