

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

UNITED STATES OF AMERICA,

v.

STEVE OMAR MALDONADO,

Defendant.

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Cr. No. 21-cr-00176 (CJN)

**UNOPPOSED MOTION TO CONTINUE STATUS HEARING
& BRIEF STATUS UPDATE**

Mr. Steve Maldonado, through undersigned counsel, respectfully submits this motion to continue the next status hearing, currently set for February 2, 2022 at 10:30 a.m., and as grounds therefore states:

1. On February 8, 2021, Mr. Maldonado was charged by criminal complaint with Entering and Remaining on Restricted Buildings or Grounds in Violation of 18 U.S.C. § 1752(a)(1) and (2), and Violent Entry or Disorderly Conduct, and Parade, Demonstrate, or Picket on Capitol Grounds in violation of 40 U.S.C. § 5104(e)(2)(D) and (G). *See* ECF No. 1.
2. On February 12, 2021, Mr. Maldonado appeared in the U.S. District Court of the District of Columbia for an initial appearance. At that hearing, Magistrate Meriweather released Mr. Maldonado on his personal recognizance subject to conditions. *See* ECF No. 5.
3. On March 3, 2021, a federal grand jury indicted Mr. Maldonado on the previously listed misdemeanor charges, and felony charges of Obstructing an Official Proceeding, in violation of 18 U.S.C. § 1512(c)(2), and Aiding and Abetting the

same, in violation of 18 U.S.C. § 2.

4. Mr. Maldonado's next status conference is scheduled for February 2, 2022 at 10:30 a.m. *See* Minute Order (Nov. 24, 2021). However, undersigned will be on leave and out of the jurisdiction on that date.
5. Upon discussion with government counsel, AUSA Graciela Rodriguez Lindberg, the parties agreed to ask for a continuance for 30 days and provide the following update to the Court:
 - a. To date, the parties have participated in five status conferences. *See* Minute Entry and Orders (Mar. 15, 2021; May 13, 2021; Jul. 13, 2021; Sept. 14, 2021; and Oct. 25, 2021).
 - b. At each status conference, the parties have explained to the Court that discovery is ongoing, particularly in regards to global discovery. In fact, "Global Discovery 9" was delivered to undersigned on December 22, 2021, and "Global Discovery 10" is expected any day now.
 - c. The global discovery productions contain voluminous material that take time for undersigned to digest.
 - d. It is unknown how many global discovery productions the government intends to distribute going forward, but more are expected, which may coincide or be in addition to the Relativity database being populated and available for consumption by the federal defense bar.
6. Therefore, given the status of this case, which continues to remain in discovery and plea negotiations, and given undersigned's unavailability for a status conference on February 2, 2022, the parties request that the next status hearing be rescheduled for 30

