

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case No.: 21-CR-00445 (CKK)
	:	
v.	:	
	:	
ANDREW ALAN HERNANDEZ,	:	
	:	
Defendant.	:	

**JOINT STATUS REPORT**

COMES NOW, the United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and defendant, by and through his counsel, Samuel C. Moore, file this joint status report to provide the Court with the current status of this matter since the status hearing on July 14, 2022.

1. The government has reviewed its prior discovery productions and provided defendant with updated and additional discovery.

2. Defendant has reviewed the government’s plea offer and it has been accepted. Therefore, the parties request that the Court schedule this matter for a plea hearing. Currently, the matter is scheduled for a videoconference status hearing on September 6, 2022, at 11:00 a.m.

3. Because the defendant has agreed to plead guilty pursuant to a plea agreement, the parties request that the Court toll the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.* (the “STA”), in the interests of justice, from September 6, 2022, until the date of the plea hearing.

4. The parties are available in September for a plea hearing on the following dates: the afternoon of September 21, September 22-23, September 26, the afternoon of September 27, and September 29.<sup>1</sup>

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney  
D.C. Bar No. 481052

By: /s/ Diane G. Lucas  
DIANE G. LUCAS  
Assistant United States Attorney  
D.C. Bar No. 443610  
601 D Street NW, Fifth Floor  
Washington, DC 20530  
(202) 252-7724  
Diane.Lucas@usdoj.gov

/s/Samuel C. Moore  
SAMUEL C. MOORE, ESQUIRE  
D.C. Bar No. 1015060  
Law Office of Samuel C. Moore, PLLC  
526 King Street, Suite 506  
Alexandria, VA 22314  
(703) 535-7809  
scmoorelaw.com  
Counsel for Defendant

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<sup>1</sup> If the Court sets the matter for a plea hearing via videoconferencing, the parties are also available on September 6, 2022.