

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

UNITED STATES OF AMERICA :
 :
 :
 v. : **Case No.: 21-CR-508 (BAH)**
 :
LUKE WESSLEY BENDER and :
LONDON BRYCE MITCHELL, :
 Defendants. :

**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, Luke Wesley Bender, by and through his counsel, and Landon Bryce Mitchell, by and through his counsel (collectively, “the parties”), file this Joint Status Report Regarding Stipulated Trial pursuant to the Court’s November 2, 2022 Minute Entry Order.

As noted in the parties’ Joint Motion to Stay Pretrial Deadlines (ECF No. 72), 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 Defendants’ appeal rights with respect to their respective 18 U.S.C. § 1512(c)(2) charges, and (3) afford the Defendants the benefit of credit for acceptance of responsibility in the calculation of their Sentencing Guidelines ranges. The government has already provided the defendants with draft materials for the Stipulated Trial, which defense counsel is currently reviewing with their clients.

Therefore, the parties respectfully request the Court’s permission to, on or before November 14, 2022, file (A) the parties’ Joint Proposed Procedures for Stipulated Trial, (B) the government’s proposed Statement of Facts for Stipulated Trial, to which each Defendant will have agreed, and (C) each Defendant’s Agreement and Waiver of Jury Rights.

In addition, the parties respectfully move the Court to (1) convert the currently scheduled December 2, 2022 pre-trial conference date into the date on which the Stipulated Trial will occur, (2) vacate the currently scheduled November 7, 2022 deadline to file the parties' Joint Pretrial Statement, and (3) vacate the currently scheduled trial date of January 9, 2023.

Respectfully submitted,

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