

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

**UNITED STATES OF AMERICA** :  
 :  
 v. : **Case No.: 21-CR-669 (TJK)**  
 :  
**KIM MICHAEL SORGENTE,** :  
 :  
 **Defendant.** :

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

The United States of America and defense counsel for Kim Sorgente hereby jointly update the Court and request a status hearing on July 14, 2023, and further move to exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*— between June 2, 2023 and the date of the next hearing —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 continue to work toward resolving the case short of trial, and the government continues to provide discovery that defense counsel continues to review in determining the best path forward.

In short, due to the number of individuals currently charged across the investigation into the events of January 6, 2021, and the nature of those charges, the ongoing investigation of many other individuals, the volume and nature of potentially discoverable materials, and the reasonable time necessary for effective preparation by all parties taking into account the exercise of due diligence, the failure to grant such a continuance in this proceeding would be likely to make a continuation of this proceeding impossible, or result in a miscarriage of justice. Accordingly, the ends of justice served by granting a request for a continuance outweigh the best interest of the public and the defendant in a speedy trial.

Government counsel notified the defense of the filing of this motion, and counsel joins in moving the Court to continue the status hearing to July 14, 2023, and to exclude time under the Speedy Trial Act, 18 U.S.C. § 3161, between June 2, 2023, and the next status hearing.

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney  
DC Bar No. 481052

By: /s/ Shalin Nohria  
Shalin Nohria  
Assistant United States Attorney  
D.C. Bar No. 1644392  
United States Attorney's Office  
601 D St. NW, 6.713  
Washington, D.C.,  
202-344-5763  
shalin.nohria@usdoj.gov