

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

CASE NO.: 21-CR-703-RDM

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIO CESAR CHANG,

Defendant.

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**JOINT STATUS REPORT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the Defendant, Julio Cesar Chang, by and through undersigned counsel, now submit this Joint Status Report, requested by the Court at the last status hearing on June 2, 2022.

1. Since the last hearing, the Government has produced some case-specific discovery. Additionally, the Government has provided three (3) additional global productions (dated August 23, 2022; September 16, 2022; and October 7, 2022) which are now available to undersigned counsel via Relativity and Evidence.com.
2. Additionally, several video uploads were made to the database disclosed to undersigned counsel in global discovery on August 12, 2022. As of August 22, 2022, 30,000 files consisting of body worn cameras and handheld footage from five law enforcement agencies as well as surveillance-camera footage from three law enforcement agencies has been provided through evidence.com. These files amount to over nine terabytes of information and the government has advised that it “would take 105 days to view continuously.”

3. As of the latest production on October 7, 2022, over 3.49 million files (over 4.64 terabytes of information) have been uploaded to the Relativity database and over 30,000 video files have been disclosed through production in this matter.
4. Undersigned counsel has continuously reviewed discovery but requires additional time due to the voluminous amount provided.
5. The Government and undersigned counsel have engaged in several discussions regarding a plea in this matter and will continue to confer for a possible resolution.
6. Given the additional discovery recently produced and possible re-entry into plea negotiations, the parties ask for an additional 90 days to work towards a resolution in this matter.
7. The parties agree that due to outstanding discovery and ongoing plea negotiations, the ends of justice would be served by the exclusion of time under The Speedy Trial Act from today until the next filing is due before this Court. Mr. Chang waives his rights under The Speedy Trial Act and agrees to the exclusion of time for the period from today's status report through the next date set by the Court.

WHEREFORE, the parties ask for leave to submit another joint status report on February 1, 2023. If the parties have reached a decision regarding disposition of this matter, the parties will file prior to this date.

Dated: October 31, 2022.

Respectfully submitted,

By: /s/ Joseph S. Rosenbaum  
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