

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.

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, ordered by the Court after the last status report on November 1, 2022.

1. Since the last conference, there has been additional production of global discovery.
2. Although the Government has not produced any case-specific additional discovery since the last status report on October 31, 2022, undersigned counsel still needs additional time to finish reviewing discovery (which consists of 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 and over 3.49 million files).
3. 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.
4. Given the amount of discovery produced in this case and need to finalize plea negotiations, the parties ask for an additional 30 days to work towards a resolution in this matter.

5. 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 March 3, 2023. If the parties have reached a decision regarding disposition of this matter, the parties will file prior to this date.

Dated: January 31, 2023.

Respectfully submitted,

By: /s/ Joseph S. Rosenbaum
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Florida Bar No. 240206

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