

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 reports submitted on March 2nd and March 17th, 2023.

1. Chang was recently discharged from an in-patient brain and spine program at Neulife Neurological Services.
2. The Government and undersigned counsel have engaged in several discussions regarding a plea in this matter.
3. The parties are close to finalizing the terms of the plea and for scheduling reasons request that this case be set for Change of Plea the week of June 26, 2023.
4. 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 request that this case be set for Change of Plea the week of June 26, 2023 or alternatively, July 3rd, 4th or 5th, 2023.

Dated: May 24, 2023.

Respectfully submitted,

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

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