

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Case No. 22-cr-60 (BAH)</b>
	:	
	:	
<b>VINCENT GILLESPIE,</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT STATUS REPORT**

Pursuant to the Court's Order, the United States and Defendant Vincent Gillespie provide the following Joint Status Report:

a. Possibility of Early Resolution

The parties have discussed the possibility of an early resolution of this case without trial. The government has tendered a proposed plea agreement to the defendant, which includes a provision that the offer will expire on July 14, 2022. As of the filing of this Joint Report, Mr. Gillespie has not yet made a final decision to accept or reject the government's proposal. Should defendant accept the plea by its expiration date, the parties will advise the Court immediately; request a change of plea hearing date; and, consistent with the Court's standing order, provide all relevant information and documentation within five business days of the scheduled change of plea hearing.

b. Speedy Trial Act

Should this case be set for trial, the parties stipulate and agree that the Court should find that the time between July 15, 2022 and the trial of this matter shall be excluded under the Speedy Trial Act, in the interests of justice. The Court should find that period of time excludable under 18 U.S.C. § 3161(h)(1) & (7)(A). The ends of justice served by the granting of such continuance outweigh the best interests of the public and the defendant in a speedy trial, for

reasons including that Mr. Gillespie and his counsel have sufficient time to review the discovery in this case and fully prepare for trial.

c. Trial

The parties believe that should this case require a jury trial, trial will take approximately four business days. The parties propose that trial commence on December 19, 2022; January 3, 2023; or January 9, 2023.

d. Motions Schedule

1. Consistent with the Court's standing order, the parties agree that a pretrial conference will be held two weeks prior to the designated trial date. The joint pretrial statement and motions in limine will be submitted 20 days prior to the pretrial conference.

2. Defendant intends to file a motion pursuant to Fed. R. Crim. P. 12(b) to dismiss Count 8 of the Superseding Indictment, which charges obstruction of an official proceeding in violation of 18 U.S.C. §§ 1512(c)(2) and 2. Defendant acknowledges that the Court has previously denied a fully briefed motion to dismiss on identical grounds. The parties therefore propose that the motion to dismiss be filed no later than the date of the pretrial statement, with the government's opposition and defendant's reply brief filed consistent with the Court's standing order regarding motions in limine.

3. A proposed motions schedule is attached to this status report.

Respectfully submitted,

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CASE NO. 21-cr-60 (BAH)</b>
<b>v.</b>	:	
	:	
<b>VINCENT GILLESPIE,</b>	:	
	:	
<b>Defendant.</b>	:	

**PROPOSED MOTION SCHEDULE**

Proposed Trial Dates:

December 19, 2022

January 3, 2023

January 9, 2023

If trial commences on December 19, 2022

Pretrial Conference – December 2, 2022

Joint Pretrial Statement and Motions in Limine – November 10, 2022 (November 11 is a federal holiday)

Consistent with the Court’s Standing Order, Motions in Limine, as well as defendant’s motion to dismiss Count 8 of the indictment, will be filed no later than the Joint Pretrial Statement (November 10, 2022); responded to within 10 days (November 21, 2022); replied to within 5 days (November 28, 2022); and fully briefed by the Pretrial Conference (December 2, 2022).

If trial commences on January 3, 2023

Pretrial Conference – December 16, 2022

Joint Pretrial Statement and Motions in Limine – November 25, 2022

Consistent with the Court’s Standing Order, Motions in Limine, as well as defendant’s motion to dismiss Count 8 of the indictment, will be filed no later than the Joint Pretrial Statement (November 25, 2022); responded to within 10 days (December 5, 2022); replied to within 5 days (December 12, 2022); and fully briefed by the Pretrial Conference (December 16, 2022).

If trial commences on January 9, 2023

Pretrial Conference – December 23, 2022

Joint Pretrial Statement and Motions in Limine – December 2, 2022

Consistent with the Court’s Standing Order, Motions in Limine, as well as defendant’s motion to dismiss Count 8 of the indictment, will be filed no later than the Joint Pretrial Statement (December 2, 2022); responded to within 10 days (December 12, 2022); replied to within 5 days (December 19, 2022); and fully briefed by the Pretrial Conference (December 23, 2022).