

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 1:21-cr-00738-BAH</b>
	:	
<b>MICHAEL OLIVERAS,</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT PROPOSED MOTIONS DEADLINE AND TRIAL DATE SCHEDULE**

The United States of America and Defendant Michael Oliveras state as follows regarding setting motions deadlines and a trial date in this case:

1. The Defendant is charged in a four count Information with violating the following statutes: Count One, 18 U.S.C. § 1752(a)(1)(Entering and Remaining in a Restricted Building or Grounds); Count Two, 18 U.S.C. § 1752(a)(2), Disorderly and Disruptive Conduct in a Restricted Building or Grounds), Count Three , 40 U.S.C. § 5104(e)(2)(D) (Disorderly Conduct in a Capitol Building); Count Four , 40 U.S.C. § 5104(e)(2)(G) (Parading, Demonstrating, or Picketing in a Capitol Building).
2. The Defendant continues to review discovery in this case.
3. The Government has extended a proposed plea agreement, which would require Defendant to plead guilty to Count 4 (40 U.S.C. § 5104(e)(2)(G) (Parading, Demonstrating, or Picketing in a Capitol Building) of the Information, with the Government dismissing counts 1 – 3 at sentencing. This proposed plea will lapse on July 18, 2022.
4. The parties propose that the Court set a Status Conference in this case the week of July 25, 2022, which the parties will request to convert to a Change of Plea hearing if the Defendant accepts the proposed plea in this case. The parties also request that, in the

- interest of justice, the Court exclude time under the Speedy Trial Act, until the next set Status Conference to allow the Defendant to continue to review discovery and to allow the parties to continue to engage in discussions for a pre-trial disposition of this case.
5. If this case cannot be resolved by plea agreement, the parties propose the following pretrial motions deadlines:
    - a. Pretrial motions must be filed by October 26, 2022;
    - b. Oppositions to any pretrial motions must be filed by November 7, 2022;
    - c. Any Reply's to filed pretrial motions must be filed by November 14, 2022;
    - d. Any Sur-reply must be filed within four (4) days after a Reply is filed if the party chooses to file a Sur-reply.
  6. A Pretrial Statement must be filed by December 2, 2022.
  7. The parties propose that the Court set the Pretrial Conference during the week of January 16, 2023.
  8. The parties propose a jury trial during the weeks of either February 20 or February 27, 2023, with the parties estimating that the trial could take 4 to 5 days with the inclusion of jury selection.

Respectfully submitted,

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