

**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 MOTION TO CONTINUE STATUS CONFERENCE**

The United States of America and Defendant Michael Oliveras state as follows regarding their Joint Motion to Continue Status Conference:

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 continue the Status Conference, which is currently set for May 27, 2022, and set a Status Conference in this case for Friday, July 22, 2022. 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. One previous extension of time or continuance was granted on May 6, 2022 to allow defense counsel to attend an out-of-town conference.

Respectfully submitted,

MATTHEW M. GRAVES  
UNITED STATES ATTORNEY  
D.C. Bar Number 481052

By: /s/ Anthony L. Franks  
ANTHONY L. FRANKS  
Assistant United States Attorney  
Bar No. 50217MO  
555 Fourth Street, N.W., Room  
Washington, DC 20530  
anthony.franks@usdoj.gov  
(314) 539-3995

/s/ Lori M. Koch  
LORI M. KOCH  
OFFICE OF THE FEDERAL DEFENDER  
District of New Jersey  
800 Cooper Street  
Suite 350  
Camden, NJ 08102  
Email: lori\_koch@fd.or  
609-649-0292