

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

UNITED STATES OF AMERICA

v.

SAMUEL LAZAR,

Defendant.

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Case No. 21-cr-525 (ABJ)

JOINT STATUS REPORT AND RESPONSE TO MINUTE ORDER

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and Hope Lefeber, counsel for Samuel Lazar (“Defendant”), hereby submit the following Joint Status Report and Response to the Court’s December 26, 2023 Minute Order. In support, the parties represent:

1. On September 29, 2023, the Press Coalition filed a motion on Docket 21-cr-525 to unseal any plea or change of plea made by Defendant; any sentencing by the Court; the transcript of any sentencing hearing; any memoranda or other filings made in connection with a sentencing hearing; any related motion to seal, response thereto; and any sealing order, which the Court denied without prejudice to refile. (Press’s Motion.)
2. The same day, the parties responded that they do not object to the unsealing of case 22-cr-071 now that Defendant has been released from the Bureau of Prisons. However, the parties requested 30 days to respond and to redact portions of documents.
3. In an October 4, 2023 Minute Order, the Court granted the motion and gave the parties the opportunity to “identify any material they would seek to have redacted from the public documents in either case and provide copies by November 2, 2023.”

4. On November 1, 2023, pursuant to the Court's order, the parties submitted documents under seal with the redactions (*see* Exhibit 1: email from November 1, 2023, without attachments included).
5. On December 26, 2023, the Court issued a Minute Order in which it stated, "nothing was submitted by [the November 2, 2023] deadline, nor has anything been submitted to date and no motion for additional time was filed." The Court then ordered the unsealing of all the sealed judicial record in the case.
6. The parties object to the unsealing of all the documents for reasons previously stated. The parties did submit redacted documents on November 1, 2023, before the Court's deadline, as the attached email shows.
7. The parties move the Court to unseal case 22-cr-071 using the redacted documents submitted on November 1, 2023 in accordance with the Court's order.
8. The parties contacted the Clerk of the Court, Angela Caesar, on December 26, 2023, and today she confirmed that the November 1, 2023 email was properly addressed to the case administrator and further advised that it will be directed to the attention of the Court.
9. The defendant is out of custody.
10. The defendant concurs with this request.

Respectfully submitted,

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