

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

PLAINTIFF,

v.

ADAM JOHNSON

DEFENDANT.

Case No. 1:21-mj-00020-GMH  
Mag. Judge: G. Michael Harvey

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**UNOPPOSED APPLICATION FOR A CONTINUANCE PURSUANT TO LCrR 57.2**

COMES NOW the defendant, ADAM C. JOHNSON, through his attorney Charles Haskell<sup>1</sup> and respectfully moves this Honorable Court to continue the status conference set for Tuesday, January 19<sup>th</sup> at 1:00. In support thereof, the parties state as follows:

1. On January 8, 2021, Mr. Johnson self-surrendered to the Federal Bureau of Investigation in the Middle District of Florida when he learned of the criminal complaint filed in this Honorable Court.

2. He had his initial appearance on January 11, 2021, in Tampa, Florida, before Middle District of Florida Magistrate Judge Christopher P. Tuite on the criminal complaint charging Mr. Johnson with one count of Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority in violation of 18 U.S.C. 1752(a), one count of Theft of Government Property in violation of 18 U.S.C. 641, and one count of Violent Entry and Disorderly Conduct on Capitol Grounds in violation of 40 U.S.C. 5104(e)(2) and was advised of the charges against him. *See U.S. v. Johnson, 8:21-mj-01020-CPT,*

*(M.D.Fla.)*

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<sup>1</sup> Mr. Haskell filed a motion to admit Attorneys Dan Eckhart and David Bigney *pro hac vice* on January 15, 2021. See Docs. 6-7.

3. At the initial appearance, Mr. Johnson waived his right to a preliminary hearing in this case and Magistrate Judge Tuite ordered him released on bond pending further proceedings. *Id. Doc. 10-11*. Magistrate Judge Tuite also set a hearing before this Honorable Court on January 19, 2021 at 1:00. The parties understand that this will be a status conference.

4. With the case just recently charged and attorneys Eckhart and Bigney's *pro hac vice* admission pending before this Honorable Court, Mr. Johnson would ask that the hearing be rescheduled to sometime in February 2021. This additional time would also allow for the parties to review and exchange discovery and meet to discuss the charges against Mr. Johnson.

5. Mr. Johnson would ask the court to make an interests of justice finding under the Speedy Trial Act and exclude the days between now and the hearing. *See 18 U.S.C. 3161(h)*.

6. Special Assistant United States Attorney Jessica Arco was consulted on January 19, 2021 and does not oppose the continuance.

WHEREFORE, pursuant to LCrR 57.2, *Application for Continuance*, the undersigned request that the hearing be rescheduled to a date in February 2021.

Dated this 19<sup>th</sup> day of January, 2021.

Respectfully submitted,

/s/ Charles R. Haskell  
Charles R. Haskell  
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*Counsel for Defendant*

**CERTIFICATE OF**  
**SERVICE**

I hereby certify that on January 19<sup>th</sup>, 2021 I electronically filed the foregoing with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached service list in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notice of Electronic filing.

Dated: January 19, 2021

/s/ Charles R. Haskell

Charles R. Haskell

*Counsel for Defendant*

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**ORDER GRANTING CONTINUANCE**

The Court has reviewed the Defendant Application for Continuance filed pursuant to LCrR 57.2 and will reschedule the Status Hearing set for January 19, 2021 at 1:00 to a date in February 2021. The Court finds that the continuance is made in the interests of justice under the Speedy Trial Act and the time that accumulates from January 19, 2021 to the hearing date is excludable time under Title 18, United States Code, Section 3161(h).

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
G. MICHAEL HARVEY  
MAGISTRATE JUDGE  
UNITED STATES DISTRICT COURT

