

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

)	
UNITED STATES OF AMERICA)	Case No. 1:21-mj-00020-GMH
)	Mag. Judge: G. Michael Harvey
v.)	
)	
ADAM JOHNSON)	
)	
)	
)	

DEFENDANT’S CONSENT MOTION TO CONTINUE STATUS HEARING

COMES NOW, Adam Johnson, the Defendant, through undersigned counsel, and respectfully moves the Court to continue the status hearing currently scheduled for Friday August 20, 2021 to any day during the second week of November 2021 and to exclude the intervening time under the Speedy Trial Act. In support of the Motion, undersigned states:

1. Mr. Johnson is before the Court charged in a criminal complaint 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).

2. The Defendant remains on release with conditions without incident.

3. The government is continuing to provide discovery and the parties are continuing negotiations in an attempt to resolve this case short of trial.

4. The parties believe that the requested continuance will allow for further production and review of discovery and facilitate resolution of this case short of trial. Therefore, the parties believe exclusion of this time would be appropriate under the Speedy Trial Act pursuant to 18 U.S.C. §3161(h)(7) as the exclusion would serve the ends of justice and outweigh the interest of the public and of Mr. Johnson in a Speedy Trial.

Respectfully submitted,

By: /s/ Dan Eckhart, Esq

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