

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CRIMINAL NO. 1:22-cr-320-JMC</b>
<b>v.</b>	:	
	:	
<b>ANTONIO LAMOTTA,</b>	:	
	:	
<b>Defendant.</b>	:	
	:	

**JOINT MOTION TO CONTINUE**

The United States of America, by and through its undersigned counsel, and joined by the defendant, request that the status conference currently scheduled for January 5, 2023 be continued for approximately 30 days, and time be excluded under the Speedy Trial Act, 18 U.S.C. § 3161.

In support of this request, the parties submit as follows:

1. On or about September 27, 2022, the defendant was charged by Indictment with various offenses arising out of conduct on January 6, 2021. *See* ECF No. 11.
2. On October 13, 2021, the defendant appeared before this Court, was arraigned on the charges in the Information, and entered a plea of not guilty. The defendant was placed on pre-trial release and ordered to abide by standard conditions. The defendant remains on pretrial release. *See* ECF Nos. 13, 14.
3. Since the inception of this case, the government has provided both case-specific and global discovery to defense counsel. The case-specific discovery includes the bulk of the FBI case file for the defendant here. The global discovery includes, among other items thousands of hours of U.S. Capitol Police surveillance video and Metropolitan Police Department (MPD) body-worn camera footage, U.S. Secret Service exterior camera footage, body-worn camera footage from Fairfax County and Montgomery County police officers, 30 hours of MPD radio

transmissions, U.S. Capitol Police after-action reports, and more than a hundred FBI interview of law enforcement officers about their experiences on January 6, aerial surveillance footages of the Capitol. The government has also produced documents aimed at facilitating a review of this global discovery, such as camera maps of the Capitol and the Capitol Visitor's Center, a transcript of the MPD radio transmissions, and spreadsheets to help track various videos and the locations of officers who recorded them.

4. The parties have discussed the matter and require additional time to evaluate whether they may reach a resolution short of trial.

5. Accordingly, the parties now jointly move this Court to continue the status conference, currently scheduled for January 5, 2023, to a time on or after February 6, 2023, a period of approximately 30 days. Such a continuance will allow the parties to continue discussions regarding a possible resolution of this matter short of trial.

6. The parties also request that time be excluded from calculation, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161, until the date of the continued status conference in this matter. The parties submit that a continuance of approximately 30 days is warranted and that an order excluding time would best serve the interests and ends of justice and outweigh the interests of the public and defendant in a speedy trial pursuant to the factors described in 18 U.S.C. §3161(h)(7)(A), (B)(i), (ii), and (iv).

WHEREFORE, the parties request that this Court continue the Status Conference currently scheduled for January 6, 2023, to a date on or after February 6, 2023, a period of approximately 30 days. The parties further request that the Court toll time under the Speedy Trial Act until the new hearing date.

Respectfully submitted,

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