

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

----- x

UNITED STATES OF AMERICA :

- v. - :

EDWARD FRANCISCO RODRIGUEZ, : **21-CR-483-DLF**

Defendant. :

----- x

**DEFENDANT’S UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE**

Defendant, Mr. Edward Francisco Rodriguez, files this unopposed motion to continue the status conference in this case, which is currently scheduled for November 1, 2021 at 10:00 a.m. approximately 90 days. Government counsel does not oppose this request. Additionally, the following facts and circumstances support Mr. Rodriguez’s request for a continuance of the status conference:

1. Mr. Rodriguez is charged with crimes associated with an assault on a federal officer, trespass, and disorderly conduct on Capitol grounds on or about January 6, 2021.
2. Mr. Rodriguez is currently on pretrial release and is in compliance with all conditions of his release.
3. The government recently disclosed several large batches of discovery in this case. Some of the discovery is so voluminous that a website database was created in collaboration between the United States Attorney’s Office and the Office of the Federal Defender for the District of Columbia specifically to permit disclosure of discovery. Additionally, certain discovery will require the exchange of physical hard drives provided by the defense via mail.

4. The government continues to provide discovery and the defense will be setting meetings to facilitate the review of discovery with Mr. Rodriguez.
5. The parties believe the requested continuance will allow for further production and review of discovery, which may facilitate resolution of this case prior to trial.
6. The parties agree that time may properly be excluded 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. Rodriguez in a speedy trial.

For the foregoing reasons, Mr. Rodriguez respectfully requests that the Court continue the status conference currently set for November 1, 2021 for approximately 90 days.

DATED: October 29, 2021

Respectfully submitted,

/s/ Nora K. Hirozawa  
**NORA K. HIROZAWA**  
Attorney for Mr. Rodriguez  
Federal Defenders of New York, Inc.  
One Pierrepont Plaza, 16<sup>th</sup> Fl.  
Brooklyn, NY 11201  
Tel.: (718) 330-1200

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 28, 2021, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to Ms. Prout, Assistant United States Attorney.

### **CERTIFICATE OF CONFERENCE**

The AUSA is unopposed to this motion.

/s/ Nora K. Hirozawa  
**NORA K. HIROZAWA**