

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA :
 :
 - v. - :
 :
 EDWARD FRANCISCO RODRIGUEZ, : **21-CR-483-DLF**
 :
 Defendant. :
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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 February 1, 2022 at 10:00 a.m. until March 29, 2022 at 10 a.m. 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 is being disclosed via an online platform that is still being set up and defense counsel has not yet been granted access to.

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 and negotiations between the parties, 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.
7. Mr. Rodriguez has no objection to the proposed continuance and agrees to the exclusion of time under the Speedy Trial Act.

For the foregoing reasons, Mr. Rodriguez respectfully requests that the Court continue the status conference currently set for February 1, 2022 until March 29, 2022.

DATED: January 19, 2022

Respectfully submitted,

/s/ Nora K. Hirozawa
NORA K. HIROZAWA
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CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2022, 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. Alison Prout, Assistant United States Attorney.

CERTIFICATE OF CONFERENCE

The AUSA is unopposed to this motion.

/s/ Nora K. Hirozawa
NORA K. HIROZAWA