

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 March 29, 2022 at 10:00 a.m. until May 11, 2022 at 11 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 additional 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.
4. Defense counsel is still in the process of reviewing discovery with Mr. Rodriguez.

5. Defense counsel is also preparing mitigation evidence for submission to the government, to aid plea negotiations.
6. 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.
7. 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.
8. 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 March 29, 2022 until May 11, 2022.

DATED: March 28, 2022

Respectfully submitted,

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

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 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