

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 July 27, 2022 at 10:00 a.m. until September 27, 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. On July 12, 2022, the government disclosed additional discovery in this case. Discovery in this case 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. According to the government’s July 12, 2022, cover letter, at least 1,880,698 files have been produced as discovery to date, a substantial number of which are under protective order.

4. Defense counsel is still in the process of reviewing discovery with Mr. Rodriguez.
5. Defense counsel has submitted mitigation materials to the government and the parties are currently engaged in ongoing 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 July 27, 2022 until September 27, 2022.

DATED: July 20, 2022

Respectfully submitted,

/s/ Nora K. Hirozawa
NORA K. HIROZAWA
Attorney for Mr. Rodriguez
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CERTIFICATE OF SERVICE

I hereby certify that on July 20, 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 Mr. Will Widman, Assistant United States Attorney.

CERTIFICATE OF CONFERENCE

The AUSA is unopposed to this motion.

/s/ Nora K. Hirozawa
NORA K. HIROZAWA