UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

Case No. 22-mj-56

JOHN DAVID ROSS GOULD,

v.

:

Defendant.

STATUS REPORT AND UNOPPOSED MOTION TO CONTINUE PRELIMINARY HEARING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby submits the following Status Report. The government also respectfully moves the Court to continue the Status Conference and Preliminary Hearing currently scheduled for July 19, 2022 for a period of approximately 60 days, and to exclude the intervening time under the Speedy Trial Act. Defendant, through his counsel, Peter Cooper, does not oppose. In support of the Motion, the government represents:

1. The defendant is before the Court charged in a criminal complaint with: Entering and Remaining in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(2); Entering and Remaining on the Floor of Congress, in violation of Title 40, United States Code, Section 5104(e)(2)(A); Disorderly Conduct in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(G) (ECF No. 1).

- 2. The government has compiled and processed the discovery in this matter and will begin producing it to defense shortly. Time is then needed for defense to review the discovery.
- Following review of the discovery, it is expected the parties will engage in discussions to resolve the matter short of trial.
- 4. The parties believe it is in the interest of justice to toll the Speedy Trial Act while the government continues to provide discovery and the parties discuss resolving the matter. The parties thus request a tolling of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), based on the factors described in 18 U.S.C. 3161(h)(7)(B)(i), (ii), and (iv), as well as 18 U.S.C. § 3161(h)(1)(G).
- 5. Therefore, the parties request the July 19, 2022 Status Conference and Preliminary Hearing be continued for approximately 60 days, and that there is an exclusion of time under the Speedy Trial Act from July 19, 2022, through the next scheduled Status Conference.
- 6. The defendant is out of custody.
- 7. The defendant concurs with this request.

Respectfully submitted,

MATTHEW M. GRAVES United States Attorney

By: /s

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