

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. 21-CR-464-RCL
	:	
JON MOTT,	:	
	:	
Defendant.	:	

JOINT MOTION FOR CONTINUANCE AND BRIEF STATUS REPORT

The United States, by and through its attorney, and Defendant, by and through his attorney, (collectively, “the Parties”), respectfully submit this motion to continue the next status hearing, currently set for May 18, 2022 at 12:30pm, and state as follows:

1. On July 13, 2021, Defendant was charged by way of information with (Count One) Entering and Remaining in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(1); (Count Two) Disorderly and Disruptive Conduct in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(2); (Count Three) Disorderly Conduct in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(2)(D); and (Count Four) Parading Demonstrating, or Picketing in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(G). ECF 14.

2. The Defendant has been out on bond since his initial arrest on May 13, 2021. Defendant remains compliant with conditions of release.

3. On May 21st, and on July 23rd, 2021, the parties appeared for video status conferences in this matter, and the Court ordered the tolling of the Speedy Trial clock through September 23, 2021. Since September 23, 2021, the Court has granted continuances in this case

and ordered the exclusion of time under the Speedy Trial Act (collectively) through May 18, 2022.

The next status conference in this matter is scheduled for May 18, 2022 at 12:30 pm.

4. Since March 13, 2022, the filing of the most recent status report, defense counsel has been advised that the following items among others, have been produced (under Global Productions 13, and 14) to the defense Relativity workspace: video footage from a French news agency; several MPD files regarding arrest paperwork, BOLO material and tips; several USCP files regarding emails, prisoner processing, event chronology and abandoned property; a spreadsheet of MPD body-worn camera serial numbers and owner names; MPD injured officer case files; Prince George County Material, U.S. Capitol Police (USCP) Crime Scene Unit material; USCP Comprehensive After-Action Report, documents and other materials related to several specific persons. As of this juncture 151,174 files have been provided to defense Relativity database and corresponding index have been provided via USAFx. Defense counsel has access to this defense Relativity workspace and parties remain compliant with issued protective order (ECF 11).

5. Parties are agreed to a 30-day continuance of this matter and to excluding the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq. Parties believe this time will allow for further production and review of discovery and facilitate resolution of this case short of trial.

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WHEREFORE, parties respectfully request that the next status hearing in this matter, presently scheduled for May 18, 2022, be continued for 30 days and that the Court find that, in the interest of justice, the time between now and the next status hearing be excluded from the speedy trial calculations.

Respectfully submitted,

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