

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-394 (TNM)
	:	
MATTHEW MARTIN,	:	
Defendant.	:	

JOINT MOTION TO CONTINUE STATUS HEARING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, Matthew Martin, respectfully move this Honorable Court to continue the status hearing currently scheduled for December 17, 2021, a date in January 2022, as further specified below, with time excluded under the Speedy Trial Act.

In support of this motion, the parties submit the following:

1. The government has been providing defendant-specific discovery, as well as global discovery pertaining to the events of January 6, 2021, to the defense on a rolling basis.
2. The government extended a plea offer for the defendant’s consideration via a letter dated September 30, 2021.
3. The defense is still reviewing discovery and considering the plea offer.
4. The government expects global discovery will be substantially completed by the end of the calendar year. The government is amenable to leaving the plea offer open until at least that time.
5. The parties wish to continue the status hearing currently set for December 17, 2021, to a date in January 2022 to allow for review of the discovery and consideration of the plea offer to continue.
6. The parties are available for a status hearing in this matter on January 18, January 19

(other than from 12 to 1 pm ET), January 27, or January 28 (other than from 11 am to 1 pm ET), 2022.

7. The parties agree that the interests of justice will be served by excluding time and outweigh the defendant's and the public's interest in a speedy trial.

WHEREFORE, the parties respectfully ask this Court to continue the status hearing currently scheduled for December 17, 2021, to January 18, 19, 27, or 28, 2022.

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY

By: /s/ Mary L. Dohrmann
MARY L. DOHRMANN
NY Bar No. 5443874
Assistant United States Attorney
555 4th Street, N.W.
Washington, D.C. 20530
(202) 252-7035
Mary.Dohrmann@usdoj.gov

/s/ Dan Cron
DAN CRON
Counsel to the Defendant