

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No.: 1:21-cr-00128-RC</b>
	:	
<b>WILLIAM POPE, and</b>	:	
<b>MICHAEL POPE,</b>	:	
	:	
<b>Defendants.</b>	:	

**CONSENT MOTION TO CONTINUE STATUS CONFERENCE  
AND FOR EXCLUDABLE DELAY**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully files this consent motion to continue the status conference in the above-captioned matter. The Government and the Defendants agree that there is good cause to extend the status conference presently scheduled for March 11, 2022, at 9:30 am before the Honorable Rudolph Contreras, United States District Court Judge. Respectfully, the parties request that the status conference be rescheduled to a date after April 28, 2022. Each defendant agrees with this request and believes that the continuance is necessary for the reasons stated herein.

In January 2022, the defendants retained new counsel. *See* ECF Nos. 48-49. Thereafter, the Government provided new counsel with discovery. As a result of this discovery review, the parties have identified additional reports that need to be identified and disclosed. This will likely require the interview of witnesses specific to this case and the events of January 6, 2021. The parties believe that a continuance to obtain this additional information is necessary for a meaningful evaluation of the evidence in this case and to facilitate meaningful

plea negotiations and an adequate defense.

The parties have reviewed their calendars and respectfully propose a status conference reset to the afternoon of **April 29, 2022, or May 3, 4, or 5, 2022**. The parties also request that the status conference be conducted remotely by video because the defendants reside in Kansas and Idaho.

The parties agree that the failure to grant this continuance “would deny counsel for the defendant . . . the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” 18 U.S.C. § 3161(h)(7)(B)(iv). Therefore, “the ends of justice served by the granting of such continuance [will] outweigh the best interests of the public and the defendant in a speedy trial,” 18 U.S.C. § 3161(h)(7)(A), and the parties request an order to that end. The parties agree that pursuant to 18 U.S.C. § 3161, the time from March 11, 2022, to the date set by this Court, shall be excluded in computing the date for speedy trial in this case.

By the filing of this motion, the Government represents that counsel for the Defendants: Gregory B. English for William Pope, and Bruce H. Searby for Michael Pope, agree with this motion.

Respectfully submitted this the 8th day of March, 2022.

MATTHEW M. GRAVES  
UNITED STATES ATTORNEY

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the forgoing motion was served upon counsel of record through ECF on the date of filing, this the 8th day of March, 2022.

By: /s/ Michael W. Mitchell  
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