

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-361-TNM
	:	
MICHAEL TIMBROOK,	:	
	:	
Defendant.	:	

JOINT MOTION TO CONTINUE STATUS CONFERENCE FOR 45 DAYS

The United States of America and the defendant, Michael Timbrook, jointly request to continue the status conference, set for July 29, 2021, approximately 45 days to a date convenient for the Court.

As grounds for the motion, the government states that on May 14, 2021, the government filed an Information, charging the defendant with: entering and remaining in a restricted building or grounds, in violation of 18 U.S.C. § 1752(a)(1); disorderly and disruptive conduct in a restricted building or grounds, in violation of 18 U.S.C. § 1752(a)(2); entering and remaining in certain rooms in the Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(C); disorderly conduct in a Capitol building, in violation of 40 U.S.C. § 5104(e)(2)(D); and parading, demonstrating, or picketing in a Capitol building, in violation of 40 U.S.C. § 5104(e)(2)(G). Since that date, the government has produced discovery to the defendant, and the parties are in active plea negotiations.

The parties would request an additional 45 days to finalize a plea agreement. The parties anticipate requesting to change the status conference to a Rule 11 hearing.

The parties would further request that the Court exclude the period from July 29, 2021 to the new date for a status conference, finding that the ends of justice served by excluding the period

of this continuance outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A).

Sincerely,

MICHAEL TIMBROOK,

CHANNING D. PHILLIPS
Acting United States Attorney

/s/ Maria Jacob (by LS)
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