

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Case No. 21-CR-280 (TJK)</b>
	:	
<b>MICHAEL LEE HARDIN,</b>	:	
	:	
<b>Defendant.</b>	:	

**UNOPPOSED MOTION TO CONTINUE SEPTEMBER 23, 2021  
STATUS CONFERENCE FOR 60 DAYS AND TO  
EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through its attorney, the Acting United States Attorney for the District of Columbia, hereby moves this Court to grant its Motion to Continue September 23, 2021 Status Conference for 60 days. The Government further moves move the Court to exclude the period of the continuance from the computation of time under the Speedy Trial Act. In support of this motion, the Government states as follows:

1. On May 27, 2021, the Court held a status conference in this case. The parties discussed that discovery had been provided to the defendant, and that the government would continue to supplement discovery.
2. The government has continued to supplement discovery, including, most recently, by providing defense counsel with approximately 850 pages of reports from U.S. Capitol Police (USCP) investigations of alleged wrongdoing by USCP officers on January 6, 2021. The USCP reports were provided to defense counsel on September 14, 2021, almost as soon as they were made available to undersigned counsel.

3. Defense counsel has indicated to undersigned counsel that he requires additional time to review the USCP reports before further discussing the plea agreement that was extended to the defendant on August 4, 2021.

4. Defense counsel and the defendant do not oppose the filing of this motion or the exclusion of time under the Speedy Trial Act.

5. Given the government's recent production of voluminous discovery and defense counsel's request for additional time to discuss the plea agreement with the defendant in light of this new discovery, and considering the reasonable time necessary for effective preparation by all parties taking into account the exercise of due diligence, the failure to grant such a continuance in this proceeding would be likely to make a continuation of the proceeding impossible, or result in a miscarriage of justice. Accordingly, the ends of justice served by granting a request for a continuance outweigh the best interest of the public and the defendant in a speedy trial.

WHEREFORE, for the foregoing reasons, the Government respectfully requests that the Court grant this Motion to Continue September 23, 2021 Status Conference for 60 days, and further request that the Court exclude the period from September 23, 2021 until the next status conference in this case from the computation of time under the Speedy Trial Act.

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