

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE NO. 21-mj-278 (RMM)
	:	
DILLON PAUL HOMOL,	:	
	:	
Defendant.	:	

**JOINT MOTION TO CONTINUE STATUS HEARING
AND TO EXCLUDE TIME UNDER SPEEDY TRIAL ACT**

The United States of America, by and through the Acting United States Attorney for the District of Columbia, and the defendant, by and through his counsel, respectfully move this Court to continue the status hearing currently scheduled for October 21, 2021, and to exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) from October 21, 2021 until the date of the next status hearing in this case, to be determined by the Court. In support whereof, the government states as follows:

1. The defendant was charged by criminal complaint on March 4, 2021, on charges of Obstruction of an Official Proceeding, in violation of 18 U.S.C. §§ 1512(c)(2) & 2; Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority, in violation of 18 U.S.C. § 1752(a)(1) & (2); and Violent Entry and Disorderly Conduct on Capitol Grounds, in violation of 40 U.S.C. § 5104(e)(2)(D) & (G).
2. The defendant was arrested on March 16, 2021, and an Initial Appearance was held in the Middle District of Florida on March 17, 2021, following which the defendant was released on bond pending trial.

3. An Initial Appearance was held in this District on April 28, 2021. Further status hearings were scheduled for June 28, 2021 and August 24, 2021, which were continued until October 21, 2021 at 1:00 p.m.

4. The government has engaged in a substantial production of discovery, including several hours of video footage, and the parties have engaged in preliminary discussions regarding possible resolutions of the case short of trial.

5. On September 16, 2021, the defendant's current defense counsel entered his appearance in the case, replacing the defendant's prior defense counsel.

6. The parties respectfully request a continuance of approximately 90 days to facilitate the discovery process and further discussions between the parties. Given the intervening holidays, the government proposes that a further status conference be scheduled during the weeks of January 3 or January 10, 2022, subject to the Court's availability.

7. The government further moves, pursuant to 18 U.S.C. § 3161(h)(7)(A), to exclude time under the Speedy Trial Act in the interests of justice from October 21, 2021 until the date of the next status hearing in this case, to be determined by the Court. This additional period is necessary to allow the defendant to fully review the discovery in the case, and to allow the parties to engage in discussions regarding possible resolutions of the case. Therefore, the government respectfully submits that the ends of justice served by such exclusion would outweigh the best interest of the public and the defendant in a speedy trial.

8. Counsel for the government has conferred with defense counsel regarding this motion. The defendant joins the motion to continue the status hearing and waives his rights under the Speedy Trial Act.

WHEREFORE, the government respectfully moves that the status hearing in this case currently scheduled for October 21, 2021 be continued until such date as the Court may determine, and that the time from October 21, 2021 until the date of the next status hearing in this case be excluded from computation under the Speedy Trial Act.

Respectfully submitted,

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