IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA *

vs. * Case No. 21-cr-00393 (RDM)

*

HUNTER PALM *

Defendant *

00000

UNOPPOSED STATUS REPORT

Hunter Palm, by his undersigned counsel, hereby submits the attached Status Report. For the reasons set forth below, additional time is necessary for Mr. Palm to review discovery and for continued discussions seeking to resolve the case. In addition, Mr. Palm consents to tolling the Speedy Trial clock between June 6, 2022 and September 9, 2022, in the interest of justice. AUSA Troy Edwards does not oppose the request.

- The instant case involves charges related to the events at the United States Capitol on January 6, 2021.
- 2. Mr. Palm, who has no prior convictions, is on pretrial release. He is in full compliance with the conditions of pretrial release.
- 3. Discovery in the instant case has been extraordinarily voluminous. *See* Government Notice Regarding Status of Discovery as of February 9, 2022 (ECF 25, filed 2/13/2022).
- 4. Mr. Palm requires additional time to review discovery to prepare adequately for trial or determine to resolve the case pretrial and discuss the matter with undersigned counsel.
- 5. The parties are engaged in discussions seeking to resolve the case but require additional time to do so.

6. Mr. Palm consents to the tolling of the speedy trial clock from today to and including

September 9, 2022 to allow him to continue to review the extensive discovery so as to prepare for

trial or reach a pretrial resolution of the case. Tolling of the Speedy Trial clock for these reasons

serves the ends of ends of justice and outweighs the best interest of the public and the defendant in

a speedy trial. See, e.g., 18 U.S.C. § 3161(h)(7).

WHEREFORE, Mr. Palm respectfully requests that the Court continue the case for 90 days;

toll the Speedy Trial clock from June 6, 2022 to and including September 9, 2022; and direct the

parties to file another Status Report on September 9, 2022 that shall address steps going forward and

speedy trial.

Respectfully submitted,

/s/ Carmen D. Hernandez

Carmen D. Hernandez

Bar No. MD 03366 7166 Mink Hollow Rd

Highland, MD 20777

240-472-3391

chernan7@aol.com

CERTIFICATE OF SERVICE

I hereby certify that the instant notice was served on all counsel of record 6th day of June, 2022 on all counsel of record via ECF.

/s/ Carmen D. Hernandez

Carmen D. Hernandez

2