

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

UNITED STATES OF AMERICA	:	
	:	Case No. 21-cr-00089(EGS)
v.	:	
	:	
LEWIS EASTON CANTWELL,	:	
	:	
Defendant.	:	
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GOVERNMENT’S CONSENT MOTION TO CONTINUE STATUS HEARING

The United States of America, through undersigned counsel, respectfully moves the Court to continue the status hearing currently scheduled for Friday, October 29, 2021, for a period of approximately 30 days, and to exclude the intervening time under the Speedy Trial Act. In support of the Motion, the undersigned represents:

1. Mr. Cantwell is before the Court charged in a criminal indictment with several offenses, including: Civil Disorder, in violation of, Title 18, United States Code, § 231(a)(3), (2); Obstruction of an Official Proceeding, in violation of Title 18, United States Code, § 1512(c)(2), (2); Entering and Remaining in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(2); Violent Entry and Disorderly Conduct in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(G).
2. The defendant remains out of custody, with conditions.
3. Additional discovery was recently provided to defense counsel, who will need time to review those materials with his client.

4. The parties are involved in negotiations in an attempt to resolve this case short of trial.
5. The parties believe that the requested continuance will allow for further production and review of discovery and facilitate resolution of this case short of trial.
6. A. Eduardo Balarezo, counsel for Mr. Cantwell, concurs with this request, and advises that he is only available on a Friday (at the Court's convenience).

WHEREFORE, the government respectfully requests that this Court grant the motion for a 30-day continuance of the above-captioned proceeding, and that the Court exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq., on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,
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By: /s/ Jacqueline Schesnol
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CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties listed on the Electronic Case Filing (ECF) System.

By: /s/ Jacqueline Schesnol
JACQUELINE SCHESNOL
Assistant United States Attorney