

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

UNITED STATES OF AMERICA

vs.

HUNTER PALM

Defendant

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Case No. 21-cr-00393 (RDM)

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**CONSENT MOTION TO CONTINUE STATUS HEARING AND
TOLL SPEEDY TRIAL TIME**

Hunter Palm, by his undersigned counsel, hereby respectfully moves to continue the Status Hearing scheduled for December 12, 2022 to allow counsel to continue to discuss a pretrial resolution of the case and review the voluminous discovery. In addition, Mr. Palm consents to tolling the Speedy Trial clock between December 12, 2022 and February 17, 2023, approximately 90 days, in the interest of justice. AUSA Troy Edwards consents to this request.

1. 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 February 17, 2023, 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 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 December 12, 2022 to and including February 17, 2023.

Respectfully submitted,

/s/ Carmen D. Hernandez

Carmen D. Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that the instant notice was served on all counsel of record 10th day of December, 2022 on all counsel of record via ECF.

/s/ Carmen D. Hernandez

Carmen D. Hernandez