

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

UNITED STATES OF AMERICA

v.

Case No. 21-CR-175-2 (TJK)

JOSEPH RANDALL BIGGS, et al.,

Defendants.

**DEFENDANT BIGGS' OPPOSITION TO GOVERNMENT'S MOTION TO VACATE
TRIAL DATE AND TO COMMENCE TRIAL AS SET ON MAY 18, 2022**

Biggs opposes a vacatur of the set May 18, 2022 trial date. He now enters his 12th month of pretrial detention. Biggs, 38, is the primary caregiver for a 4-year-old girl. He is an admired ex-Army staff sergeant. He has been a respected community leader everywhere he has lived. On January 6, 2021, he did not aggress or hurt anyone or anything; he barely raised his voice after entering the Capitol grounds and building. He and others didn't plan anything. His pretrial jailing is illegal. If he remains detained, he must go to trial on May 18, even while that start puts Herculean demands of preparation on himself, on each other defendant, and on defense counsel, government counsel, witnesses and possibly the Court itself. He and his counsel will be ready to try this case 7 weeks from now. Biggs requests the right to supplement this Opposition, or file a sur-reply to the government's reply.

Respectfully submitted,

COUNSEL FOR JOSEPH R. BIGGS

Dated: March 25, 2022

By: /s/ J. Daniel Hull
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CERTIFICATE OF SERVICE

The undersigned certifies that on March 25, 2022, Defendant Biggs' Opposition to Motion To Vacate Trial Date and to Commence Trial as Set for May 18, 2022 to all counsel of record via Electronic Case Filing (ECF) system.

By: /s/ J. Daniel Hull
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