

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

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
	:	
v.	:	<b>Cr. No. 21-cr-00184 (BAH)</b>
	:	
<b>JAMES ALLEN MELS,</b>	:	
	:	
<b>Defendant.</b>	:	
<hr/>	:	

**UNOPPOSED MOTION TO CONTINUE STATUS HEARING**

Mr. James Mels, through undersigned counsel, respectfully submits this motion to continue the next status hearing, currently set for February 25, 2022 at 10:00 a.m., and exclude the time within which trial must commence under the Speedy Trial Act. As grounds, he therefore states:

1. Mr. Mels is charged by Information with misdemeanor offenses related to crimes that occurred at the United States Capitol on January 6, 2021.
2. On September 15, 2021, the government tendered a formal, written plea offer to undersigned.
3. The following day, the parties filed a joint motion to continue the next status hearing and to toll the Speedy Trial Act. This Court granted that request.
4. Since that time, the parties have continued to work on resolving this case without the need for a trial. For its part, the United States recently produced, upon defendant’s request, particular video evidence germane to the case.
5. On January 18, 2022, undersigned tendered her resignation from the Office of the Federal Public Defender in D.C., effective February 11, 2022. Michelle Peterson,

Chief Assistant Federal Public Defender in D.C., has not yet reassigned Mr. Mels's case to another Assistant Federal Public Defender, but is expected to soon.

6. Additionally, undersigned understands that Assistant United States' Attorney, Monica Stump, is also leaving her position in the Department as of February 18, 2022.

Assistant United States Attorney, Benjamin Kringer, will be handling Mr. Mels's case going forward.

7. Due to the turnover expected by both defense and government counsel, Mr. Mels would like more time to review and discuss the plea agreement previously tendered by the government.

8. Accordingly, the parties respectfully request that this Court grant defense's request for a continuance, with a new status date on or before April 5, 2022.

9. Both Monica Stump and Benjamin Kringer of the United States Attorney's Office have been consulted, and do not oppose this request.

10. Additionally, to allow the parties the fullest opportunity to resolve this case short of trial, Mr. Mels requests that the Speedy Trial Act be tolled until the next status date, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

WHEREFORE, Mr. Mels respectfully requests that the next status hearing in this matter, presently scheduled for February 25, 2022, be continued and that the Court find that, in the interest of justice, the time between now and the next status hearing be excluded from the speedy trial calculation.

Respectfully submitted,

A.J. KRAMER  
FEDERAL PUBLIC DEFENDER

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