

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

UNITED STATES OF AMERICA :
 :
 v. : **Criminal No. 21-cr-393**
 :
HUNTER PALM, :
 :
 Defendant. :

**JOINT STATUS REPORT AND MOTION
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America and defense counsel for Hunter Palm hereby jointly update the Court and request a status hearing on June 9, 2023, and further move to exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*—between May 4, 2023, and June 9, 2023—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). The parties continue to work toward resolving the case short of trial, and the government continues to provide discovery that defense counsel continues to review in determining the best path forward. Both parties have recently completed multiple-month trials and are engaged in discussions regarding resolving the case short trial. Both parties intend to know how the case will proceed by the next status hearing should the Court continue the case to June 9.

In short, due to the number of individuals currently charged across the investigation into the events of January 6, 2021, and the nature of those charges, the ongoing investigation of many other individuals, the volume and nature of potentially discoverable materials, and the reasonable time necessary for effective preparation by all parties taking into account the exercise of due diligence, the failure to grant such a continuance in this proceeding would be likely to make a


continuation of this proceeding impossible, or result in a miscarriage of justice. Accordingly, the ends of justice served by granting a request for a continuance outweigh the best interest of the public and the defendant in a speedy trial.

Government counsel notified the defense of the filing of this motion, and counsel joins in moving the Court to continue the status hearing to June 9, 2023, and to exclude time under the Speedy Trial Act, 18 U.S.C. § 3161, between May 4, 2023, and the next status hearing.

Respectfully submitted,

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