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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Case No.: 1:21-cr-00488-CRC-1

v.

**UNOPPOSED MOTION TO
CONTINUE MAY 31, 2022, STATUS
HEARING AND TO EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT**

NOAH BACON,

Defendant.

COMES NOW, counsel for Noah Bacon to respectfully request this Honorable Court to continue the May 31, 2022, status hearing and further to 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). In support of its motion, counsel states as follows:

1. The defendant is charged with violations of 18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority, in violation of 18 U.S.C. §1752(a)(2), Disorderly and Disruptive Conduct in a Restricted Building, in violation of 40 U.S.C. § 5104(e)(2)(D), Disorderly Conduct at the Grounds and in the Capitol Building, in violation of 40

United States v. Noah Bacon
Case No. 1:21-cr-00488-CRC-1

UNOPPOSED MOTION TO CONTINUE MAY
31, 2022, STATUS HEARING AND TO EXCLUDE
TIME UNDER THE SPEEDY TRIAL ACT
Page No. 1

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1 U.S.C. §5104(e)(2)(G), Parading, Demonstrating, or Picketing in a Capitol Building,
2
3 in violation of 40 U.S.C. §5104(e)(2)(G) and Obstruction of an Official Proceeding, in
4 violation of 18 U.S.C. §1512(c)(2), 2.

5
6 2. A status conference is scheduled for May 31, 2022.

7 3. Undersigned counsel will be out of the jurisdiction on May 31, 2022,
8 for personal reasons.

9
10 4. Discovery is ongoing.

11 5. Plea negotiations are ongoing.

12 6. Defense counsel has not concluded review of the discovery with the
13 defendant.

14
15 7. The United States does not oppose the motion.

16 WHEREFORE, counsel respectfully requests that this Court grant the
17 motion to continue the Status Hearing set for May 31, 2022, and that the Court
18 exclude the time within which the trial must commence under the Speedy Trial Act,
19 18 U.S.C. § 3161 et seq., on the basis that the ends of justice served by taking such
20 actions outweigh the best interest of the public and Defendant in a speedy trial
21 pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

22
23 WHEREFORE counsel respectfully requests that this motion be
24 granted.

25
26
27 Dated: May 6, 2022
28

United States v. Noah Bacon
Case No. 1:21-cr-00488-CRC-1

UNOPPOSED MOTION TO CONTINUE MAY
31, 2022, STATUS HEARING AND TO EXCLUDE
TIME UNDER THE SPEEDY TRIAL ACT
Page No. 2

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Respectfully submitted,

Joseph R. Conte, Bar #366827
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United States v. Noah Bacon
Case No. 1:21-cr-00488-CRC-1

UNOPPOSED MOTION TO CONTINUE MAY
31, 2022, STATUS HEARING AND TO EXCLUDE
TIME UNDER THE SPEEDY TRIAL ACT
Page No. 3

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