

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE NO. 21-mj-278 (RMM)
	:	
DILLON PAUL HOMOL,	:	
	:	
Defendant.	:	

**JOINT MOTION TO CONTINUE STATUS HEARING
AND TO EXCLUDE TIME UNDER SPEEDY TRIAL ACT**

The defendant, Dillon Paul Homol, through his counsel, and the United States of America, through the Acting United States Attorney for the District of Columbia, respectfully move this Court to continue the status hearing currently scheduled for February 22, 2022, for approximately 60 days until on or about April 22, 2022, and to exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) from February 22, 2022 until the date of the next status hearing in this case. In support whereof, the parties state as follows:

1. The defendant was charged by criminal complaint on March 4, 2021, on charges of Obstruction of an Official Proceeding, in violation of 18 U.S.C. §§ 1512(c)(2) & 2; Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority, in violation of 18 U.S.C. § 1752(a)(1) & (2); and Violent Entry and Disorderly Conduct on Capitol Grounds, in violation of 40 U.S.C. § 5104(e)(2)(D) & (G).

2. The defendant was arrested on March 16, 2021, and an Initial Appearance was held in the Middle District of Florida on March 17, 2021, following which the defendant was released on bond pending trial. An Initial Appearance was held in this District on April 28, 2021. The next status hearing in this case is currently scheduled for February 22, 2022.

3. The government has engaged in a substantial production of discovery, including several hours of video footage, and the parties have engaged in preliminary discussions regarding possible resolutions of the case short of trial.

4. The parties respectfully request a continuance of approximately 60 days, until on or about April 22, 2022, to facilitate the discovery process and plea discussions between the parties.

5. The government further moves, pursuant to 18 U.S.C. § 3161(h)(7)(A), to exclude time under the Speedy Trial Act in the interests of justice from February 22, 2022, until the date of the next status hearing in this case, to be determined by the Court. This additional period is necessary to allow the defendant to fully review the discovery in the case and to allow the parties to engage in discussions regarding possible resolutions of the case. Therefore, the government respectfully submits that the ends of justice served by such exclusion would outweigh the best interest of the public and the defendant in a speedy trial.

6. Counsel for the government and defense counsel have conferred regarding this motion. The defendant joins the motion to continue the status hearing and waives his rights under the Speedy Trial Act.

WHEREFORE, the defendant and the government jointly move that the status hearing in this case currently scheduled for February 22, 2022, be continued for approximately 60 days until on or about April 22, 2022, and that the time from February 22, 2022, until the date of the next status hearing in this case be excluded from computation under the Speedy Trial Act.

Respectfully submitted,

DILLON PAUL HOMOL

By: /s/James W. Hundley
James W. Hundley, Bar No. VA049
Briglia Hundley, P.C.
1921 Gallows Road, Suite 750
Tysons Corner, Virginia 22182
703-883-0204
703-883-0899 (fax)
jhundley@brigliahunley.com
Counsel for the Defendant

MATTHEW M. GRAVES
United States Attorney for the District of Columbia
D.C. Bar No. 481052

By: /s/Christopher B. Brown
Christopher B. Brown
D.C. Bar No. 1008763
555 Fourth Street, N.W., Room 4241
Washington, D.C. 20530
202-252-7153
Christoper.Brown6@usdoj.gov
Counsel for the United States of America

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of February, 2022, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will send notice of said filing (NEF) to all counsel of record in this case.

/s/James W. Hundley
James W. Hundley