

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

UNITED STATES OF AMERICA

vs.

HUNTER PALM

Defendant

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Case No. 21-cr-00393 (RDM)

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**CONSENT MOTION TO CONTINUE STATUS HEARING,
SCHEDULE A CHANGE OF PLEA HEARING AND
TOLL SPEEDY TRIAL TIME**

Hunter Palm, by his undersigned counsel, hereby respectfully moves to continue the Status Hearing scheduled for June 2, 2023 for approximately 45 days to July 14, 2023 and schedule a change of plea hearing. The Government and Mr. Palm have reached a plea agreement in principle but require additional time to finalize the terms of the agreement and for counsel to discuss its terms fully with Mr. Palm. AUSA Troy Edwards consents to this request. In addition, Mr. Palm consents to tolling the Speedy Trial clock between June 2, 2023 and July 14, 2023, in the interest of justice. AUSA Troy Edwards consents to this request.

1. The instant case involves charges related to the events at the United States Capitol on January 6, 2021. The parties have reached an agreement in principle to resolve the case but require additional time to finalize the terms of the plea agreement and review it fully with Mr. Palm.

2. Mr. Palm, who was only 18 years old at the time of the events underlying the charges, has no prior convictions.

3. Mr. Palm resides in Colorado. Since his arrest in May 2021, he has been on pretrial release. He is in full compliance with the conditions of pretrial release.

4. Discovery in the instant case has been extraordinarily voluminous, *see* Government Notice Regarding Status of Discovery as of February 9, 2022 (ECF 25, filed 2/13/2022), and the issues involved in the case have been complex.

5. Both the prosecutor and undersigned counsel have been involved in unrelated trials involving seditious conspiracy and other serious charges.

6. Despite due diligence, the parties require additional time to finalize the terms of the plea agreement and for undersigned counsel to effectively review the facts and circumstances of the case with Mr. Palm to allow him to make an informed and voluntary decision regarding the plea agreement.

7. Mr. Palm requests that the Court schedule a change of plea hearing for July 14, 2023 or such other time as the Court is available.¹

8. Mr. Palm consents to the tolling of the speedy trial clock from June 2, 2023 to and including July 14, 2023 to allow for adequate time to finalize and review the terms of the plea agreement.

9. In light of the above-noted factors – including Mr. Palm’s youth, the complexity of the legal issues, the voluminous discovery, and the extensive negotiations that the parties have undertaken – the period of delay resulting from the requested continuance serves the ends of justice and outweighs the best interest of the public and the defendant in a speedy trial. *See, e.g.*, 18 U.S.C. § 3161(h)(7).

¹ Commencing on July 10, 2023, undersigned counsel will be in trial commencing but will be available Friday afternoons after 12:30 p.m.

WHEREFORE, Mr. Palm, with the consent of the Government, respectfully requests that the Court continue the case for 45 days, schedule a change of plea hearing for July 14, 2023, and toll the Speedy Trial clock from June 2, 2023 to and including July 14, 2023.

Respectfully submitted,

/s/ Carmen D. Hernandez _____

Carmen D. Hernandez

Bar No. MD 03366

7166 Mink Hollow Rd

Highland, MD 20777

240-472-3391

chernan7@aol.com

CERTIFICATE OF SERVICE

I hereby certify that the instant notice was served on all counsel of record this 2d day of June, 2023, on all counsel of record via ECF.

/s/ Carmen D. Hernandez _____

Carmen D. Hernandez