

**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 PLEA HEARING AND
TOLL SPEEDY TRIAL TIME**

Hunter Palm, by his undersigned counsel, hereby respectfully moves to continue the Plea Hearing scheduled for July 14, 2023 to July 21, 2023 to allow necessary time for undersigned counsel to consult with Mr. Palm regarding the plea agreement, which the parties have reached in principle. In addition, Mr. Palm consents to tolling the Speedy Trial clock to and including July 21, 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.

2. Mr. Palm, who has no prior convictions, is on pretrial release. He is in full compliance with the conditions of pretrial release.

3. Counsel for the parties have been involved in complex trials in unrelated cases. The government has tendered a plea offer to Mr. Palm, which he has accepted in principle. However, additional time is necessary for undersigned counsel to explore fully the details of the plea with Mr. Palm and make necessary modifications, if any.

4. Mr. Palm consents to the tolling of the speedy trial clock from today to and including July 21, 2023 to allow him the necessary time to consult with counsel regarding the resolution of the case. Tolling of the Speedy Trial clock for these reasons 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).

WHEREFORE, Mr. Palm respectfully requests that the Court continue the plea hearing and toll the Speedy Trial clock to and including July 21, 2023.

Respectfully submitted,

/s/ Carmen D. Hernandez

Carmen D. Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that the instant notice was served on all counsel of record 12th day of July 2023, on all counsel of record via ECF.

/s/ Carmen D. Hernandez

Carmen D. Hernandez