UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

: CASE: 1:21-CR-00050-CRC

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JENNIFER LEIGH RYAN
JASON LEE HYLAND

KATHERINE STAVELEY SCHWAB

Defendants. :

UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE

The United States of America, by and through its undersigned counsel, respectfully requests this Court grant its Unopposed Motion to Continue Status Conference. The Government further moves to exclude the period of the continuance from the computation of time under the Speedy Trial Act. In support of this motion, the Government states as follows:

- 1. On July 15, 2021, the Court held a Status Conference in this case. The parties discussed that discovery had been provided to the parties, and that the Government would continue to supplement discovery. Following the hearing, the Court entered a Minute Entry tolling the Speedy Trail Act from July 15, 2021 through September 30, 2021. A date for the next Status Conference has not been set.
- 2. On July 29, 2021, Defendant Jennifer Leigh Ryan plead guilty to Count Four of the Second Superseding Information, filed on June 7, 2021.
- 3. The remaining parties have discussed the possibility of pretrial resolution of case, but have not decided upon the parameters of a plea agreement. The Government also anticipates producing additional discovery.
- 4. On September 29, 2021, attorneys for the Defendants and the Government agreed that a Status Conference should be continued for approximately additional 30 days. The parties in

that discussion also agreed to exclude from the computation of time under the Speedy Trial Act the time between September 30, 2021, and the next set Status Conference. The parties also request that the Court conduct the next Status Conference via videoconference.

5. The Government submits that good cause exists to continue this hearing as there is no additional information to provide to the Court regarding the status of this case.

WHEREFORE, for the foregoing reasons, the Government respectfully requests that the Court grant this Motion to Continue Status Conference for 30 days, and further requests that the Court exclude the period from September 30, 2021 until the next Status Conference in this case from the computation of time under the Speedy Trial Act.

Respectfully submitted,

CHANNING D. PHILLIPS Acting United States Attorney DC Bar No. 415793

By: /s/ Frances E. Blake

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CERTIFICATE OF SERVICE

On September 29, 2021, a copy of the foregoing was served on all counsel of record for the defendants via the Court's Electronic Filing System.

/s/ Frances E. Blake
FRANCES E. BLAKE
Assistant United States Attorney

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ORDER

Based upon the representations in the United States' Unopposed Motion to Continue, and upon consideration of the record, the Court makes the following findings:

The unusual complexity of the Capitol Attack investigation warrants the requested continuance. Given the number of individuals currently charged across the Capitol Attack investigation and the nature of those charges, the on-going investigation of many other individuals, the volume and nature of potentially discovery 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.

Therefore, it is this _____ day of September/October, 2021,

ORDERED that the United States' Unopposed Motion to Continue, is hereby GRANTED; it is further

ORDERED that this proceeding is continued to October/November_____, 2021, at ; and it is further

ORDERED that the time period from the date of this Order through and including the date of the next hearing is hereby excluded from the computation of time within which an indictment must be filed under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq*.

THE HONORABLE CHRISTOPHER R. COOPER UNITED STATES DISTRICT JUDGE