

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

UNITED STATES OF AMERICA :
 :
 v. : **Criminal No. 21-cr-538**
 :
JACOB TRAVIS CLARK, :
 :
 Defendant. :

UNOPPOSED MOTION TO CONTINUE STIPULATED TRIAL

Jacob Clark, by his attorney, respectfully requests that this Honorable Court continue his Stipulated Trial as the expiration of the CARES Act requires him to be in person. In support of his Motion, counsel states the following.

1. On April 21, 2021, Mr. Clark was arrested in Colorado on the charges relating to events on January 6, 2021 at the U.S. Capitol.
2. On April 28, 2021, Mr. Clark was released on his own personal recognizance.
3. Mr. Clark has had no reported violations of pretrial release during the life of this case.
4. Mr. Clark is set for a stipulated trial on December 6, 2022.
5. When the parties set Mr. Clark's court date, this Court was authorized to conduct Mr. Clark's stipulated trial by video. Since then, the authorization has expired and the Court is required to conduct this hearing in person.
6. Mr. Clark is indigent and lives in Laramie, Wyoming. A flight would be prohibitively expensive so Mr. Clark intends to travel to the District by car. Given the length of the trip, Mr. Clark requests additional time so that he may obtain leave from work and obtain childcare for the daughter he raises by himself.
7. Mr. Clark thus requests that his stipulated trial date be continued until January 30, 2022

at 11 am. Counsel understands that the Court and the government are available at that time.

8. Mr. Clark does not oppose exclusion under the Speedy Trial Act until that date.
9. The Government does not oppose this Motion.

Conclusion

Mr. Clark respectfully requests that the Court continue stipulated trial date to January 30, 2022.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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