

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

**UNITED STATES OF AMERICA** :

:

**v.** :

:

**KEVIN JAMES LYONS,** :

:

**Defendant.** :

**Criminal No.: 21-CR-79-BAH**

**UNOPPOSED MOTION TO CONTINUE STATUS HEARING AND  
MOTION TO CONTINUE CASE IN CHIEF**

Now comes the Defendant, Kevin Lyons, by his Lawyer, Lawrence Wolf Levin, and moves this for a 30 (thirty) day continuance in the above—captioned matter. In support thereof, Defendant states as follows:

1. Defendant is charged by Indictment with violations of 18 U.S.C. § 1752(a) and 40 U.S.C. § 5104(e)(2)(C) and (D), related to crimes that occurred at the United States Capitol on January 6, 2021.
2. That the Government previously tendered a Plea Agreement in the above—captioned matter, to which there have been protracted discussions.
3. Counsel has made numerous requests upon the Government relative to Inspection and to tender certain documents which would aid in an appropriate decision in the instant matter; which to date have not been answered or tendered.
4. That there has been continual colloquy between Counsel for Kevin Lyons and the Government and that this request is not being made to delay justice, but in the interest of possibly resolving the matter short of litigation.
5. That Counsel for the Government has no objection to this request for a continuance.

WHEREFORE, Defendant, Kevin Lyons, through counsel, request this Court to grant this unopposed Motion to Continue the Status Hearing set for August 12, 2022, for an additional 30 days and that the Court exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, from the date this Court enters an Order on this motion through and including the date of the next hearing on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and Defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,

/s/Lawrence Wolf Levin  
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