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

UNITED STATES OF AMERICA,

Case No.: 1:21-cr-00503-RCL-1

v.

**UNOPPOSED MOTION TO
CONTINUE MAY 5, 2022, STATUS
HEARING AND TO EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT**

GLENN ALLEN BROOKS,

Defendant.

COMES NOW, Glenn Alen Brooks, through counsel, and hereby moves this Court to continue the in-person May 5, 2022 Status Hearing to an in-person status hearing the second week in June or thereafter, convenient to all parties, and further to exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq., on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). In support of its motion counsel would state:

1. The defendant is charged by Information with misdemeanor offenses related to crimes that occurred at the United States Capitol on January 6, 2021.
2. An in-person Status Hearing is set for May 5, 2022.
3. Undersigned counsel is scheduled to start a six (6) week trial in the Eastern District of Virginia on April 11, 2022.

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1 4. The defendant wishes to meet in-person with counsel prior to the
2 hearing.
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5 5. Discovery is ongoing, and counsel has not concluded review of the
6 discovery with the defendant.

7 6. Plea negotiations are ongoing.

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9 7. Counsel for the United States does not oppose this motion.

10 Accordingly, counsel respectfully requests that this Court grant the
11 motion to continue the Status Hearing set for May 5, 2022, until mid-June and
12 enters an order on this motion through and including the date of the next hearing,
13 and that the Court exclude the time within which the trial must commence under
14 the Speedy Trial Act, 18 U.S.C. § 3161 et seq., on the basis that the ends of justice
15 served by taking such actions outweigh the best interest of the public and
16 Defendant in a speedy trial pursuant to the factors described in 18 U.S.C. §
17 3161(h)(7)(A), (B)(i), (ii), and (iv).
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20 WHEREFORE counsel respectfully requests that this motion be
21 granted.
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24 Dated: March 23, 2022
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Joseph R. Conte, Bar #366827
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