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

UNITED STATES OF AMERICA,

Case No.: 1:21-cr-00488-CRC-1

v.

**UNOPPOSED MOTION TO
CONTINUE THE OCTOBER 17,
2022, TRIAL DATE AND TO
EXCLUDE TIME UNDER THE
SPEEDY TRIAL ACT**

NOAH BACON,

Defendant.

COMES NOW, counsel for Noah Bacon to respectfully request this Honorable Court to continue the, October 17, 2022, trial date 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 states as follows:

1. The defendant is charged with violations of 18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority, in violation of 18 U.S.C. §1752(a)(2), Disorderly and Disruptive Conduct in a Restricted Building, in violation of 40 U.S.C. § 5104(e)(2)(D), Disorderly Conduct at the Grounds and in the Capitol Building, in violation of 40

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Law Office of Joseph R. Conte
400 Seventh St., N.W. #206
Washington, D.C. 20004
Phone: 202.638.4100
Email: dcgunlaw@gmail.com

1 U.S.C. §5104(e)(2)(G), Parading, Demonstrating, or Picketing in a Capitol Building,
2
3 in violation of 40 U.S.C. §5104(e)(2)(G) and Obstruction of an Official Proceeding, in
4
5 violation of 18 U.S.C. §1512(c)(2), 2.

6 2. Trial is currently scheduled for October 17, 2022.

7 3. At the status hearing on September 16, 2022, the court advised of a
8
9 scheduling conflict and requested the parties discuss a continuance of the trial date.

10 4. Undersigned , the defendant and counsel for the United States
11
12 have agreed to a continuance and the defendant has consented to excluding time
13
14 under the Speedy Trial Act to February 27, 2023.

15 5. In addition, undersigned counsel can use the additional time to
16
17 prepare for trial.

18 WHEREFORE, counsel respectfully requests that this Court grant the
19
20 motion to continue the trial set for, October 17, 2022, and that the Court exclude
21
22 the time within which the trial must commence under the Speedy Trial Act, 18
23
24 U.S.C. § 3161 et seq., on the basis that the ends of justice served by taking such
25
26 actions outweigh the best interest of the public and Defendant in a speedy trial
27
28 pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Dated: September 16, 2022

Respectfully submitted,

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Law Office of Joseph R. Conte
400 Seventh St., N.W. #206
Washington, D.C. 20004
Phone: 202.638.4100
Email: dcgunlaw@gmail.com

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Joseph R. Conte, Bar #366827
Counsel for Noah Bacon
Law Office of J.R. Conte
400 Seventh St., N.W., #206
Washington, D.C. 20004
Phone: 202.236.1147
Email: dcgunlaw@gmail.com

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400 Seventh St., N.W. #206
Washington, D.C. 20004
Phone: 202.638.4100
Email: dcgunlaw@gmail.com