

2. On June 15, 2022, the government filed a consent motion to continue and exclude time under the Speedy Trial Act. On June 21, 2022, the Court entered an Order granting the motion. The Court ordered that the time period from June 17, 2022, through July 17, 2022, be excluded from the computation of time under the Speedy Trial Act and found that such a continuance was in the interest of justice.
3. The parties have been engaged in active plea negotiations. On June 15, 2022, counsel for Mr. Jones submitted a proposed plea offer to the government, and on June 21, 2022, the government responded with a counteroffer. On July 6, 2022, the government spoke with defense counsel, who indicated that he would like more time to be able to meet with his client and go over specific electronic evidence previously provided. The government has provided approximately 41 gigabytes of defendant-specific multimedia discovery to include body worn camera footage, closed circuit television footage, and open-source video footage from January 6. Defense counsel has requested more time to review this footage in depth with his client so his client can make an informed decision regarding the government's plea offer.

WHEREFORE, the United States, with the consent of counsel for the defendant, respectfully requests that this Court grant the motion for an approximately 30-day continuance of the above-captioned proceeding, or until the next status hearing set by the Court, 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.*, 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), and failure to grant such a continuance would result in a miscarriage of justice.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar Number 481052

By:



Stephen J. Rancourt
Texas Bar No. 24079181
Assistant United States Attorney, Detailee
601 D Street, NW
Washington, D.C. 20530
(806) 472-7398
stephen.rancourt@usdoj.gov