

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

**UNITED STATES OF AMERICA** :  
 :  
v. : **Case No. 1:21-CR-00131- PLF**  
 :  
**JASON GERDING and** :  
 :  
**CHRISTINA GERDING.** :  
 :  
**Defendants.** :

**CONSENT MOTION TO CONTINUE STATUS HEARING  
FOR SIXTY DAYS**

Jason Gerding and Christina Gerding, through counsel, hereby move this Court, with consent of the United States, through its counsel, to continue the status hearing set for February 9, 2022 for sixty (60) days. Mr. and Mrs. Gerding further consent to excluding the period of the continuance from the computation of time under the Speedy Trial Act until the next status hearing. In support of this motion, the parties state as follows:

1. On June 11, 2021, the Court held a Status Hearing in this case. The parties discussed that a substantial amount of discovery had been provided to the parties, and that the Government would continue to supplement discovery. The parties also discussed the possibility of resolving this case by plea agreement, which has not occurred to date.

2. On February 8, 2022, counsel for Defendants and the Government agreed that the Court's Status Hearing, which is set for February 9, 2022, should be continued. Although the Government has made significant progress in uploading voluminous discovery to the Relativity database (the primary vehicle of searchable discovery that is being shared with all January 6<sup>th</sup> defendants), that process is not complete. The parties understand that the uploading will be substantially complete within the next week. Moreover, defense counsel have not yet been able to access the discovery already uploaded to Relativity. Counsel for Mr. Gerding has not been

trained for Relativity (although he has a user name and password) and counsel for Mrs. Gerding has not yet received a user name and password (although he has been trained).

3. The parties do not have additional information to provide to the Court currently.
4. The parties also agree to exclude from the computation of time under the Speedy Trial Act the time between February 9, 2022 and the next Status Hearing.
5. The Government consents to this Motion.

**Conclusion**

For the foregoing reasons, the parties hereby respectfully request that the Court grant this Motion to Continue Status Hearing for Sixty Days, and further request that the Court exclude the period from February 6, 2022 until the next Status Hearing in this case occurs from the computation of time under the Speedy Trial Act.

Respectfully submitted,

A. J. KRAMER  
FEDERAL PUBLIC DEFENDER

/s/

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/s/

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