

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BRADLEY STUART BENNETT,
ELIZABETH ROSE WILLIAMS,

Defendants.

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Criminal No. 21-CR-312-JEB

**JOINT MOTION TO CONTINUE NOVEMBER 22, 2021 STATUS
HEARING AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America and Defendants, Bradley Stuart Bennett and Elizabeth Rose Williams, through counsel move this Court for a 45-day continuance of the Status Hearing set for November 22, 2021, 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 defendants 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, the parties state as follows:

- 1.** Defendants are charged by Indictment with offenses related to crimes that occurred at the United States Capitol on January 6, 2021.
- 2.** This Court held a status conference for Defendants on May 4, 2021. Since that hearing, this Court has granted several unopposed continuances of Status Hearings, most recently on September 16, 2021.
- 3.** Over the last two months, the United States has continued to provide discovery to Defendants, predominately from outside sources. The United States expects to disclose additional discovery, mostly from other sources, in the future. The parties have also

continued their efforts to resolve this matter by plea. The parties had made some progress in resolving Mr. Bennett's case, however, Mr. Watkins reports needing additional time to review the plea terms with his client. The United States and Ms. Williams have finalized their discussions and are in the process of formalizing their agreement in writing and exchanging the formal paperwork.

- 4.** On November 12, 2021, the parties conferred on the case status and agreed that a 45-day continuance of the Status Hearing set for November 22 would assist the parties in their ongoing plea negotiations and in allowing additional time to provide and review ongoing discovery disclosures. The parties also agreed to toll the Speedy Trial Act from the date this Court enters an Order on this motion through and including the date of the next Status Hearing. The parties further request that the Court conduct the next Status Hearing via videoconference.

Accordingly, the parties respectfully request that this Court grant this Motion to Continue the Status Hearing set for November 22 for an additional 45 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

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ORDER

Based upon the representations in the Joint Motion to Continue November 22, 2021 Status Hearing and to Exclude Time Under the Speedy Trial Act, and upon consideration of the entire record, the Court makes the following findings:

Defendants are charged by Indictment with offenses related to crimes that occurred at the United States Capitol on January 6, 2021. On May 4, 2021, this Court held a Status Hearing. Since then, the United States has continued to provide discovery to Defendants and expects additional disclosures in the future. The parties also have engaged in plea negotiations, but that process remains ongoing. Accordingly, the parties filed a Joint Motion to Continue the Status Hearing set for November 22, 2021, and further requested that this Court toll the Speedy Trial Act from the date this Court enters an Order on this motion through and including the date of the next Status Hearing.

The Court agrees that the ends of justice served by granting a continuance outweigh the best interest of the public and the defendant in a speedy trial under 18 U.S.C. § 3161(h)(7)(A) based on the factors described in 18 U.S.C. § 3161(h)(7)(B)(i)(ii) and (iv).

Therefore, it is this ____ day of _____, 2021,

ORDERED that the Joint Motion to Continue November 22, 2021 Status Hearing and to

Exclude Time Under the Speedy Trial Act, is GRANTED; it is further

ORDERED that this proceeding is continued to _____, 2022, at _____; and it is further

ORDERED that the time from the date of this Order through and including the date of the next hearing is hereby excluded from the computation of time within which trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*

THE HONORABLE JAMES E. BOASBERG
UNITED STATES DISTRICT JUDGE