

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	Case No.: 21-CR-50 (CJC)
JASON LEE HYLAND,	:	
	:	
Defendant.	:	

UNOPPOSED MOTION TO CONTINUE PLEA HEARING

Jason Lee Hyland, by counsel, Nina J. Ginsberg, respectfully moves this Court to continue the Plea Agreement Hearing, presently set for March 9, 2022 at 2:00 PM by VTC.¹ As grounds for this motion, Mr. Hyland states as follows:

On June 7, 2021, the government filed a five-count, Second Superseding Information charging Mr. Hyland, Jennifer Leigh Ryan and Katherine Staveley Schwab with violations of: 18 U.S.C. § 1752(a)(1) (Entering and Remaining in a Restricted Building); 18 U.S.C. § 1752(a)(2) (Disorderly and Disruptive Conduct in a Restricted Building); 40 U.S.C. § 5104(e)(2)(D) (Violent Entry and Disorderly Conduct in a Capitol Building); 40 U.S.C. § 5104(e)(2)(G) (Parading, Demonstrating, or Picketing in a Capitol Building); and 40 U.S.C. § 5104(e)(2)(F) (Act of Physical Violence in the Grounds). On August 19, 2021, Ms. Ryan pled guilty to one count of Parading in a Capitol Building in violation of 40 U.S.C. § 5104(e)(2)(G). On November 10, 2021, this Court sentenced Ms. Ryan to a term of 60 days imprisonment, with no term of supervised release, a \$10 special assessment, restitution in the amount of \$500, and a \$1,000

¹ The Minute Entry for the status hearing on 2/17/2022, as to JASON LEE HYLAND states: Plea Hearing set for 3/9/2022 at 2:00 PM by VTC. On 3/1/2022, a Notice of Hearing appeared on the Docket as to JASON LEE HYLAND setting a Status Conference for 3/9/2022 at 3:00 PM by VTC.

fine. The remaining counts were dismissed by the government. Ms. Schwab's case is set for trial on June 20, 2022 at 9:00 AM.

Mr. Hyland appeared with his counsel at a Status Hearing on February 17, 2022. At the hearing, counsel for Mr. Hyland informed the Court that Mr. Hyland expected to accept the government's plea offer but that additional time was needed for the parties to resolve their differences over the inclusion of certain information in the Statement of Offense. Mr. Hyland's counsel also informed the Court that she had experienced a recent death in the family and had been unable to resolve outstanding differences with the government for that reason. The Court set the Plea Agreement Hearing for March 9, 2022, but informed the parties that it would grant them additional time if requested by Mr. Hyland's counsel.

The parties are still attempting to reach agreement on the information to be included in the Statement of Offense and are, therefore, not ready to proceed with the Plea Agreement Hearing on March 9, 2022. Mr. Hyland, therefore, requests this Court to continue the Plea Hearing for a period of one to two weeks, or until such time as the Court's docket permits, to permit Mr. Hyland and his counsel to further review video discovery and to reach agreement with the government on the contents of the Statement of Offense.²

The parties represent that they have worked diligently and collaboratively to resolve these matters. The government does not oppose this motion.

Respectfully submitted,

JASON LEE HYLAND
By Counsel

² The Court initially proposed setting the Plea Hearing at the end of March or beginning of April. Because counsel for Mr. Hyland is scheduled to begin a three-to-four-week trial in the Eastern District of Virginia on March 29, 2022, the parties agreed to March 9, 2022, the alternative date proposed by the Court.

/s/ Nina J. Ginsberg
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CERTIFICATE OF SERVICE

On March 6, 2022, a copy of the foregoing was served on all counsel of record via the Court's Electronic Filing System.

/s/ Nina J. Ginsberg
Counsel for Jason Lee Hyland