

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

UNITED STATES OF AMERICA)	
)	Criminal No. 21-88 (DLF)
v.)	Judge Friedrich
)	Motions Hearing: April 26, 2022
RONALD SANDLIN)	
and)	
NATHANIEL DeGRAVE)	

**UNOPPOSED JOINT MOTION TO EXTEND DEADLINES
FOR PRETRIAL MOTIONS AND RELATED FILINGS
AND TO CONTINUE PRETRIAL-MOTIONS HEARING**

COMES NOW the defendants, Ronald Sandlin and Nathaniel DeGrave, by and through undersigned counsel, and respectfully move this Honorable Court to extend the deadlines for pretrial motions and related filings by 60 days and to continue the pretrial-motions hearing from April 26, 2022 to a date approximately 60 days later that is agreeable to the Court and the parties. In support of this motion, Mr. Sandlin and Mr. DeGrave would show:

1. Pretrial motions in this case are currently due on March 9, 2022; responses are due on March 30, 2022; and replies are due on April 6, 2022. A pretrial-motions hearing is scheduled for April 26, 2022. Time under the Speedy Trial Act has been tolled until April 26, 2022.
2. Undersigned counsel are still reviewing discovery for this case. The government has provided counsel a voluminous amount of discovery specific to the case. Moreover, discovery related generally to all the January 6 cases is being put up on the Axon Evidence.com platform and the Deloitte Relativity platform. While counsel for

Mr. Sandlin has received training on how to use both platforms and has been licensed to access the Axon Evidence.com platform, his license request for the Deloitte Relativity platform is still being processed.

3. Mr. Sandlin, Mr. DeGrave, and the government are still in the process of trying to resolve this case with a plea agreement, and communications between the parties about a possible plea agreement are ongoing. By preparing substantive pretrial motions and related filings, the government will be investing resources, which in turn will lessen its incentive to resolve this case short of trial. Also, if this case is resolved with a plea, having the parties prepare substantive pretrial motions and related filings that are then mooted results in the unnecessary expenditure of resources. On this point, it should be noted that Mr. Sandlin is represented by court-appointed counsel.

4. Currently, a trial date in this case has not been set.

5. On February 28, 2020, counsel for Mr. Sandlin spoke by phone with Assistant United States Attorney Jessica Arco. Ms. Arco graciously indicated that the government does not oppose extending the deadlines for pretrial motions and related filings by 60 days and continuing the pretrial-motions hearing from April 26, 2022 to a date approximately 60 days later that is agreeable to the Court and the parties.

6. In order to give counsel for Mr. Sandlin and Mr. DeGrave more time to review the discovery in this case, to foster plea discussions, and to avoid the unnecessary expenditure of resources, undersigned counsel move the Court to extend the deadlines for pretrial motions and related filings by 60 days and to continue the pretrial-motions hearing from April 26, 2022 to a date approximately 60 later that is agreeable to the Court and the parties.

7. If the Court grants this motion, Mr. Sandlin and Mr. DeGrave agree to waive their rights under the Speedy Trial Act from April 26, 2022 to whatever date the pretrial-motions hearing gets rescheduled for.

WHEREFORE, the defendants, Ronald Sandlin and Nathaniel DeGrave, move this Honorable Court to extend the deadlines for pretrial motions and related filings by 60 days and to continue the pretrial-motions hearing from April 26, 2022 to a date approximately 60 days later that is agreeable to the Court and the parties.

Respectfully submitted,

/s/

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