

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

WILLIAM McCALL CALHOUN

Defendant.

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CASE NO. 1:21-CR-00116 DLF

**UNOPPOSED MOTION TO CONTINUE APRIL 21, 2022 STATUS
HEARING AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America moves this Court for a continuance of the Status Hearing set for April 21, 2022, 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)(1)(D), (h)(7)(A), and (7)(B)(i), (ii), and (iv). In support of its motion, the Government states as follows:

1. Defendant is charged by indictment with one felony and four misdemeanor offenses related to crimes that occurred at the United States Capitol on January 6, 2021.
2. Since the last status hearing, the Defendant filed three substantive motions related to this case on March 21, 2022. ECF Nos. 99-101. The United States has responded to one motion (ECF No. 105), and two additional responses are due on or before April 25, 2022. *See* April 1, 2022 Minute Order. Defendant's reply briefs will be due thereafter. Pursuant to 18 U.S.C. § 3161(h)(1)(D), delay resulting from the filing of the motions, from the filing of the motions through the conclusion of the hearing on, or other prompt disposition of, the motions, shall be excluded in the computing of the time within which the trial must commence.

3. Further, the parties have conferred on the case status and agree that a continuance until June 9, 2022 at 10 a.m. will assist the parties and the Court in completing briefing and preparing for argument and decisions on the motions. It will also allow for any additional global discovery disclosures and review of those disclosures. The Government requests 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.

Accordingly, the Government respectfully requests that this Court grant this Motion to Continue the Status Hearing set for April 21, 2022 and set a new status conference for June 9, 2022 at 10 a.m. The Government further requests 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 public and Defendant in a speedy trial pursuant to the factors described in 18 U.S.C. §§ 3161(h)(1)(D), (h)(7)(A), and (7)(B)(i), (ii), and (iv).

Respectfully submitted,

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