

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 21-cr-128 (RC)**
 :
 WILLIAM POPE, and :
 MICHAEL POPE, :
 :
 Defendants. :

**JOINT MOTION TO CONTINUE THE MAY 5, 2021 STATUS HEARING AND
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, and Defendant, William Pope, by and through his counsel Terry Eaton, Esq., and Defendant, Michael Pope, by and through his counsel Carlos Vanegas, hereby jointly move to continue the May 5, 2021 status hearing scheduled for 11:30 AM before the honorable United States District Judge Rudolph Contreras. The parties request a status hearing be set in 30 to 45 days and jointly move to exclude the time within which the trial must commence between May 3, 2021 and the next status hearing set by the Court 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 pursuant to the parties agreement. In support of its motion, the government states as follows:

1. On February 1, 2021, the parties all appeared for an initial status hearing before District Judge Contreras, at which time the Court set a status hearing on May 3, 2021, which was subsequently continued to May 5, 2021.
2. The government has continued to review this case and make reasonable efforts to collect all relevant evidence related to these particular co-defendants charges stemming from the incidents at the U.S. Capitol on January 6, 2021. The investigation and prosecution of the Capitol

Attack will likely be one of the largest in American history, both in terms of the number of defendants prosecuted and the nature and volume of the evidence. The nature and size of the overall investigation understandably affects the timeline for each individual case.

3. The government and defense have discussed a protective order regarding discovery in this case, and the government is providing voluminous discovery upon agreement of the protective order. During any continuance granted by the Court the parties also intend to discuss an available pre-trial resolution and the government will continue to collect, catalogue, and provide relevant discovery.

4. The parties have conferred and agree that continuing the May 5, 2021 status hearing for 30 to 45 days would best serve the interests and ends of justice and outweighs the interests of the public and the Defendants in a speedy trial.

WHEREFORE, the parties respectfully jointly request that the May 5, 2021 status hearing be continued for 30 to 45 days. The parties further request that the Court make a finding that it is in the interests of justice that the time between May 3, 2021 (being the original status date) and the next status date be excluded from the Speedy Trial Act calculation.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY
D.C. Bar No. 415793

By: /s/ Jeffrey N. Poulin
Jeffrey N. Poulin
WV Bar No. 11437
Assistant United States Attorney
United States Attorney's Office
555 Fourth Street, N.W.
Washington, DC 20530
Phone: (202) 252-2641