



2. The defendant was presented for an Initial Appearance in the District of Columbia on February 8, 2021. He continues to be released on bond pending trial.

3. On February 24, 2021, an Indictment was returned against the defendant, charging him with the same offenses alleged in the Criminal Complaint.

4. On May 7, 2021, a Superseding Indictment was returned against the defendant, charging him with the same offenses alleged in the original Indictment.

5. The government has engaged in a substantial production of discovery, including several hours of video footage specific to the defendant, as well as video footage responsive to defense requests. While defendant-specific discovery is substantially complete, the government continues to review and produce discovery common to all January 6, 2021 cases.

6. On August 25, 2021, the government extended a plea offer to the defendant. The defendant has requested more time to consider the plea offer in light of continuing discovery in the case.

7. The parties respectfully request a continuance of approximately 75 days to facilitate the discovery process and further plea discussions between the parties. Given the intervening holidays, the government proposes that a further status conference be scheduled during the week of January 17, 2022, subject to the Court's availability.

8. The government further moves, pursuant to 18 U.S.C. § 3161(h)(7)(A), to exclude time under the Speedy Trial Act in the interests of justice from November 4, 2021 until the date of the next status hearing in this case, to be determined by the Court. This additional period is necessary to allow the defendant to fully review the discovery in the case, and to allow the parties to engage in discussions regarding the government's plea offer. Therefore, the government

respectfully submits that the ends of justice served by such exclusion would outweigh the best interest of the public and the defendant in a speedy trial.

9. Counsel for the government has conferred with defense counsel regarding this motion. The defendant joins the motion to continue the status hearing and waives his rights under the Speedy Trial Act.

WHEREFORE, the government respectfully moves that the status hearing in this case currently scheduled for November 4, 2021 be continued until such date as the Court may determine, and that the time from November 4, 2021 until the date of the next status hearing in this case be excluded from computation under the Speedy Trial Act.

Respectfully submitted,

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