

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

UNITED STATES OF AMERICA

V.

**KRISTI MUNN,
THOMAS MUNN,
DAWN MUNN,
JOSHUA MUNN,
KAYLI MUNN,**

Defendants.

[illegible]

Case No.: 1:21-cr-00474-BAH

**JOINT MOTION TO CONTINUE JANUARY 28, 2022 STATUS
HEARING AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America and Defendants, Kristi Munn, Thomas Munn, Dawn Munn, Joshua Munn, and Kayli Munn, through counsel move this Court for a 60-day continuance of the Status Hearing set for January 28, 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)(7)(A), (B)(i), (ii), and (iv). In support of its motion, the parties state as follows:

1. Defendants are charged by Information with four misdemeanor offenses related to crimes that occurred at the United States Capitol on January 6, 2021.
2. Since Defendants' Arraignment and first Status Hearing, the United States has provided and continues to provide individualized discovery to Defendants, as it becomes available. The United States also has provided discovery from outside sources, such as other individuals charged with offenses on January 6, 2021. The United States expects to

disclose additional discovery, predominately from other sources, in the future. The United States also begun discussing the resolution of this case by plea. We have provided formal, written plea offers to two Defendants expect to extend formal offers to the remaining three Defendants by the end of this week.

- 3.** The parties have conferred on the case status and agreed that a 60-day continuance of the Status Hearing set for January 28 would assist the parties in their ongoing plea negotiations and in allowing additional time to provide and review ongoing discovery disclosures. It also would allow defense counsel additional time to review the formal, written offers with their clients. The parties also agreed to 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. The parties further request that the Court conduct the next Status Hearing via videoconference.

Accordingly, the parties respectfully request that this Court grant this Motion to Continue the Status Hearing set for January 28 for an additional sixty days and 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)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,

/s/

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