

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

UNITED STATES OF AMERICA,)	
)	
v.)	No. 21-CR-499 EGS
DANIEL SCOTT,)	
)	
Defendant.)	
_____)	

JOINT MOTION TO CONTINUE STATUS CONFERENCE

The United States of America, through the U.S. Attorney for the District of Columbia, and joined by defendant Daniel Scott, through undersigned counsel, request that the status conference currently scheduled for June 14, 2022 at 1:00 p.m. be continued for 45 days, and that the Court exclude the time until that next status conference date from the time within which the indictment must be returned and 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 defendant 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, the parties submit as follows:

1. The defendant is charged in this case in a multi-count indictment with a number of serious felony and misdemeanor offenses arising from the protests and eventual riot at the U.S. Capitol on January 6, 2021.
2. The government has provided, and will continue to provide, considerable pretrial discovery materials. Last week, the government provided additional discovery materials, including a substantial number of communications of Mr. Scott that were captured on another defendant’s phone. In addition, the government will be producing the scoped

image of Mr. Scott's cell phone this week; the production of that data was delayed due to a filter review that began in February 2022.

3. The parties continue to explore a potential resolution of this case, and are actively negotiating to determine if such a resolution is possible.
4. Finally, Mr. Scott was recently joined by superseding indictment to another defendant's case, that of Christopher Worrell, case number 21-CR-292, before Judge Royce C. Lamberth in this Court. The government will therefore be cross-producing discovery in the two defendants' cases (beyond the cross productions it has already made). In addition, the government anticipates filing a motion to dismiss the above-captioned indictment without prejudice, as it will proceed on the charges against Mr. Scott in case number 21-CR-292. The government anticipates filing that motion to dismiss this week, after consultation with defense counsel. Therefore, the parties believe that a status conference in this case would not serve the interests of judicial economy.
5. For these reasons, the parties request a 45-day continuance of the status conference currently scheduled for June 14, 2022 at 1:00 p.m. The parties further request that the time until the date of the continued status conference in this matter be excluded from calculation of the time necessary to commence a trial, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161. The parties submit that a continuance of approximately 45 days is warranted and that an order excluding time would best serve the interests and ends of justice and outweigh the interests of the public and defendant in a speedy trial.

WHEREFORE, the United States and Mr. Scott request that this Court continue the status conference currently scheduled for June 14, 2022 at 1:00 p.m. for a period of 45 days, and that

the Court exclude the time until that next status conference date from 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 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,

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