UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

.

v. : CRIMINAL NO. 21-CR-00708 (RCL)

:

LEO CHRISTOPHER KELLY,

Defendant. :

CONSENT MOTION TO CONTINUE STATUS HEARING

The defendant, Leo Kelly, through his attorney, Kira Anne West, respectfully files this Consent Motion to Continue the Status Hearing in the above-captioned matter, currently scheduled for February 25, 2022 until a date after March 8, 2022. In support thereof, the defendant states as follows:

- 1. On January 18, 2021, the defendant was arrested and charged by Criminal Complaint with one count of Obstruction, in violation of Unlawful Entry on Capitol Grounds, violation of 18 U.S.C. § 1752(a)(1) and (4). On December 3, 2021, the defendant was indicted with 7 counts, to include the felony 18 U.S.C. § 1512.
- 2. The government and counsel for the defendant have conferred and are continuing to communicate in an effort to resolve this matter. The government is also gathering discovery to provide to counsel for the defendant. Counsel for the defendant has a personal commitment on February 25th, 2022 and will not be available for the status hearing.
- 3. Undersigned counsel has communicated with AUSA James who does not oppose this motion and both parties are available after March 8, 2022. The parties, therefore, would

2022. The parties agree that the interests and ends of justice are best served and outweigh the interests of the public and the defendant in a speedy trial, and that this adjournment will allow the parties to continue negotiations in an effort to achieve a

respectfully request that the status hearing be continued until a date after March 8,

resolution before trial. Therefore, the parties agree that pursuant to 18 U.S.C. § 3161,

the time from February 25, 2022 through the next court date shall be excluded in

computing the date for speedy trial in this case.

Wherefore, the parties respectfully request that the Court continue the status hearing in this matter until sometime after March 8, 2022, or to a date after that date convenient to the Court's calendar.

Respectfully submitted,

By: /s/

Kira Anne West
D.C. Bar No. 993523
712 H Street, N.E.
Washington, D.C. 20002

202-232-2042

kiraannewest@gmail.com Counsel for Mr. Kelly

FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:
v.	: : CRIMINAL NO. 21-CR-708(RCL)
LEO CHRISTOPHER KELLY, Defendant.	: :
<u>ORDER</u>	
This matter having come before the	Court pursuant to a Motion to Continue, upon
consent, it is therefore	
ORDERED that the parties shall	appear for a Status Hearing at on
, 2022. It is further	
ORDERED that pursuant to the repre	esentations made by the parties, the interests and
ends of justice are best served and outweigh the interests of the public and the defendant in a	
speedy trial. Pursuant to 18 U.S.C. § 31	61, the time from February 25, 2022 through
, 2022 shall be excluded in computing the date for speedy trial in this case.	
	Hon. Royce C. Lamberth United States District Judge