

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-mj-278 (RMM)
v.	:	
	:	
DILLON PAUL HOMOL,	:	
	:	
Defendant.	:	

**UNOPPOSED MOTION TO CONTINUE STATUS HEARING
AND TO EXCLUDE TIME UNDER SPEEDY TRIAL ACT**

The United States of America, by and through the United States Attorney for the District of Columbia, respectfully moves this Court to continue the status hearing currently scheduled for December 13, 2022 for approximately 60 days until on or about February 21, 2023, and to exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) from October 11, 2022 until the date of the next status hearing in this case. In support whereof, the government states as follows:

1. The defendant was charged by criminal complaint on March 4, 2021, on charges of Obstruction of an Official Proceeding, in violation of 18 U.S.C. §§ 1512(c)(2) & 2; Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority, in violation of 18 U.S.C. § 1752(a)(1) & (2); and Violent Entry and Disorderly Conduct on Capitol Grounds, in violation of 40 U.S.C. § 5104(e)(2)(D) & (G). He was arrested on March 16, 2021.

2. The government has produced, and continues to produce, a substantial volume of defendant-specific discovery, including a large amount of electronic and video footage, and the parties continue to engage in discussions regarding possible resolutions of the case short of trial. On December 30, 2021, the government provided a plea offer to the defendant. The defendant

has since presented a counteroffer, which the government is currently evaluating and considering in light of recently obtained evidence.

3. The parties respectfully request a continuance of approximately 60 days, until on or about February 21, 2023 to facilitate the ongoing discovery process and plea discussions between the parties.

4. 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 December 13, 2022 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 possible resolutions of the case. 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.

5. Counsel for the government has conferred with defense counsel regarding this motion. The defendant does not oppose the motion to continue the status hearing or to exclude time under the Speedy Trial Act.

WHEREFORE, the government respectfully moves that the status hearing in this case currently scheduled December 13, 2022 be continued for approximately 60 days until on or about February 21, 2023, and that the time from December 13, 2022 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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