

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 21-mj-550</b>
	:	
<b>CYNTHIA BALLENGER, and</b>	:	
<b>CHRISTOPHER PRICE,</b>	:	
	:	
<b>Defendants.</b>	:	

**JOINT MOTION TO CONTINUE AND  
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through its attorney the United States Attorney for the District of Columbia, and the Defendants, Cynthia Ballenger and Christopher Price, by and through their attorney Steven Levin, hereby move this Court to vacate the status conference presently scheduled for November 12, 2021, to continue the matter for approximately 28 days, and further to exclude the time within which an information or indictment must be filed 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). On November 5, 2021, the United States extended a plea offer to the Defendants. The requested continuance will allow the Defendants and their attorney to discuss and consider this plea offer, and counsel for all parties an opportunity to engage in discussions about potential pre-trial resolution of this matter. Further, the United States notes that the investigation into the Capitol Breach presents novel and complex discovery issues, as described in the filed discovery memoranda.

The parties submit that under these circumstances, the ends of justice to be served by an approximately 28-day continuance outweigh the interests of the public and the Defendants in a

speedy trial, and the Court should consequently exclude time under the Speedy Trial Act for the above stated reasons.

Undersigned counsel has provided a copy of this motion to Steven Levin, counsel for Defendants, and Mr. Levin informed the undersigned that this may be filed as a joint motion. The parties have conferred and respectfully request a status conference be scheduled for December 9 or December 10, 2021.

WHEREFORE, the parties respectfully request that this Court grant the motion for an approximately 28-day continuance of the above-captioned proceeding, and that the Court exclude the time within which an information or indictment must be filed 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).

Respectfully submitted,

MATTHEW M. GRAVES  
UNITED STATES ATTORNEY  
D.C. Bar No. 481052

By:           /s/ Jacob R. Steiner            
Jacob R. Steiner  
California Bar No. 325239  
Special Assistant United States Attorney  
United States Attorney's Office  
555 Fourth Street, N.W.  
Washington, DC 20530  
Phone: (202) 924-5829  
Jacob.Steiner@usdoj.gov