

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-696 (TJK)
	:	
MICHAEL AARON CARICO,	:	
	:	
	:	
Defendant.	:	

JOINT MOTION 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 Defendant, Michael Aaron Carico, by and through his attorney Camille Wagner, hereby move this Court to exclude the time within which a 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). The United States recently extended a plea offer to the Defendant and exclusion of time will allow counsel for the Defendant an opportunity to review the extensive discovery in this matter and discuss the plea offer with the Defendant, and counsel for all parties an opportunity to engage in discussions about pre-trial resolution. 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. *See, e.g.*, ECF No. 21.

The parties submit that under these circumstances, the ends of justice to be served by excluding time until the December 21, 2021, status conference outweigh the interests of the public and the Defendant 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 Camille Wagner, counsel for Defendant Michael Aaron Carico, and Ms. Wagner informed the undersigned that this may be filed as a joint motion.

WHEREFORE, the parties respectfully request that this Court exclude the time within which a trial must be 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).

Respectfully submitted,

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