

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 1:21-CR-519-TFH
v.	:	
	:	
STEVEN C. BILLINGSLEY,	:	
	:	
Defendant.	:	

GOVERNMENT’S CONSENT MOTION TO CONTINUE STATUS HEARING

The United States of America, through undersigned counsel, respectfully moves the Court to continue the status hearing currently scheduled for Wednesday, January 19, 2022, for a period of approximately 60 days, and to exclude the intervening time under the Speedy Trial Act. In support of the Motion, the undersigned represents:

1. Mr. Billingsley is before the Court charged in a criminal information with four misdemeanor offenses: Entering and Remaining in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(1) and Disorderly and Disruptive Conduct in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(2).
2. The defendant remains on release with conditions.
3. In addition to the voluminous discovery already produced in this case, the undersigned is still awaiting additional material from law enforcement. That information needs to be sent to defense counsel, who will then need time to review it with his client.
4. The parties need additional time to review the discovery and explore whether this case can be resolved short of trial.
5. The parties believe that the requested continuance will allow for further production and review of discovery and facilitate discussions of a potential resolution short of trial.

WHEREFORE, the government respectfully requests that this Court grant the motion for a 60-day continuance of the above-captioned proceeding, and that the Court exclude 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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By: /s/ Susan T. Lehr
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CERTIFICATE OF SERVICE

I hereby certify that January 18, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties listed on the Electronic Case Filing (ECF) System.

By: /s/ Susan T. Lehr
SUSAN T. LEHR
Assistant United States Attorney