

**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, March 25, 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. Conte, Mr. Billingsley’s defense counsel, has represented to the government that he just finished a month-long trial has not had an opportunity to finish reviewing discovery with Mr. Billingsley. Further, Mr. Conte just gained access to Relativity and has not had time to review discovery on that platform.
2. The government has been awaiting some additional discovery from the FBI and there have been some technology issues in the transfer of information. The government needs an opportunity to receive it, review it, and get it to the defense.
3. The defendant remains on release with conditions and the parties are not aware of any issues.
4. 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 March 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