

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Criminal No. 22-CR-00205-TJK</b>
	:	
<b>BRIAN JONES, and</b>	:	
<b>PATRICK KING,</b>	:	
	:	
<b>Defendants.</b>	:	

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

The United States of America and Defendants, Brian Jones and Patrick King, through counsel move this Court for a 30-day continuance of the plea agreement hearing set for December 23, 2022, and further to 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 defendants in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). In support of its motion, the parties state as follows:

1. Defendants are charged by Information with misdemeanor offenses related to crimes that occurred at the United States Capitol on January 6, 2021. (ECF No. 18.) A plea agreement hearing is scheduled for December 23, 2022. (Min. Order, Nov. 30, 2022.)
2. The parties still intend to resolve this matter by plea; however, the parties need additional time to finalize the written agreement and related documents.
3. The parties have conferred and agree that a 30-day continuance of the plea agreement hearing is needed and appropriate.
4. The parties also agreed to toll the Speedy Trial Act from the date this Court enters an Order

on this motion through and including the date of the next hearing.

Accordingly, the parties respectfully request that this Court grant this motion to continue the plea agreement hearing set for December 23, 2022 for an additional 30 days 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.* from the date this Court enters an Order on this motion through and including the date of the next hearing 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

/s/ Matthew Moeder  
Matthew Moeder  
Assistant United States Attorney  
MO Bar No. 64036  
400 East 9<sup>th</sup> Street, Room 5510  
Kansas City, Missouri 64106  
(816) 426-4103  
Matthew.Moeder@usdoj.gov

/s/ Gregory Geist  
Gregory Geist  
Federal Public Defendant  
1601 Fifth Avenue, Suite 700  
Seattle, Washington 98101  
206-553-1100  
Gregory\_Geist@fd.org  
Attorney for Defendant Brain Jones

*/s/ Peter Cooper* \_\_\_\_\_

Peter Cooper

400 5th St. NW, Suite 350

Washington D.C. 20001

202-400-1434

pcooper@petercooperlaw.com

Attorney for Defendant Patrick King

**CERTIFICATE OF SERVICE**

I hereby certify that on December 20, 2022 I caused a copy of the this motion to be served on defense counsel of record via email.

/s/ Matthew Moeder

Matthew Moeder

Assistant United States Attorney