

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	Case No.: 1:22-CR-99 (RJL)
JAKE MAXWELL,	:	
	:	
Defendant.	:	

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

The United States of America, by and through the United States Attorney for the District of Columbia, and the Defendant, through counsel, respectfully moves this Court to continue the status hearing currently scheduled for December 14, 2022 for approximately 60 days until on or about February 14, 2023, and to exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) from December 14, 2022 until the date of the next status hearing in this case. In support whereof, the government states as follows:

1. The defendant was charged by criminal complaint on February 9, 2022, on charges of Civil Disorder, in violation of 18 U.S.C. § 231(a)(3); Assaulting, Resisting, or Impeding Certain Officers, in violation of 18 U.S.C. § 111(a)(1); Entering and Remaining in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(2); Engaging in Physical Violence in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(4); and Acts of Physical Violence in the Capitol Grounds or Buildings, in violation of 40 U.S.C. § 5104(e)(2)(F). The defendant was arrested in the Northern District of Georgia, on February 10, 2022, and he made his initial appearance

in this district on February 17, 2022.

2. On March 25, 2022, the defendant was indicted on the same charges detailed above.
3. The government has produced, and continues to produce, a substantial volume of both global and defendant-specific discovery, including significant amounts of video footage, which counsel is still reviewing. This includes ongoing efforts to reach a plea agreement.
4. The parties respectfully request a continuance of approximately 60 days, until on or about February 14, 2023, to exclude time under the Speedy Trial Act in the interests of justice from December 14, 2022 until the date of the next status hearing in this case, to be determined by the Court. This additional period is necessary to allow the defendant to fully review the discovery in the case, and to allow the parties to engage in discussions regarding possible resolutions of the case. Therefore, the parties respectfully submit that the ends of justice served by such exclusion would outweigh the best interest of the public and the defendant in a speedy trial.
5. Counsel for the government has conferred with defense counsel regarding this motion. The defendant does not oppose the motion to continue the status hearing or to exclude time under the Speedy Trial Act.

WHEREFORE, the parties respectfully move that the status hearing in this case currently scheduled for December 14, 2022 be continued for approximately 60 days until on or about February 14, 2023, and that the time from December 14, 2022 until the date of the next status hearing in this case be excluded from computation under the Speedy Trial Act.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Elizabeth N. Eriksen
ELIZABETH N. ERIKSEN
Trial Attorney, Detailee
VA Bar No. 72399
United States Attorney's Office for the
District of Columbia
601 D Street, NW
Washington, DC 20530
(202) 616-4385
Elizabeth.Eriksen@usdoj.gov