

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Case No. 22-cr-00077(BAH)
 :
 IRAJ JAVID, :
 :
 Defendant. :

**JOINT MOTION TO CONTINUE JUNE 3, 2022 STATUS
HEARING AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America and Defendant Iraj Javid, through counsel, move this Court for a 60-day continuance of the Status Hearing set for June 3, 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 defendant 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. Defendant is charged by Information with four misdemeanor offenses related to crimes that occurred at the United States Capitol on January 6, 2021.
2. Since Defendant's Arraignment and first Status Hearing, the United States has provided and continues to provide individualized discovery to Defendant, as it becomes available. The United States also has provided discovery from outside sources, such as other individuals charged with offenses on January 6, 2021. The United States expects to disclose additional discovery, predominately from other sources, in the future. The United States also has begun discussing the resolution of this case by plea. The United States intends to provide a formal, written plea offer to Defendant in the coming weeks, after Defendant and his counsel have had the opportunity to review discovery.

3. The parties have conferred on the case status and agreed that a 60-day continuance of the Status Hearing set for June 3, 2022, would assist the parties in allowing additional time to provide and review ongoing discovery disclosures and to facilitate plea negotiations. It also would allow defense counsel additional time to review any formal, written plea offer with Defendant. 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 Status Hearing. The parties further request that the Court conduct the next Status Hearing via videoconference.

Accordingly, the parties respectfully request that this Court grant this Motion to Continue the Status Hearing set for June 3 for an additional 60 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

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interest of the public and 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,

/s/

Ned Smock
Office of the Federal Public Defender
District of Columbia
625 Indiana Ave., Suite 550
Washington, DC 20004
Phone: (202) 208-7500
E-mail: ned_smock@fd.org

and

MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

By: /s/

NIALL M. O'DONNELL
DC Bar No. 991519
Assistant Chief—Detailee
Fraud Section, Criminal Division
U.S. Department of Justice
300 N. Los Angeles St., Suite 2001
Los Angeles, CA 90012
Phone: (202) 257-3295
Email: niall.odonnell@usdoj.gov