

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-342-PLF
	:	
JERAMIAH CAPLINGER,	:	
	:	
Defendant.	:	

JOINT MOTION TO CONTINUE STATUS CONFERENCE FOR 30 DAYS

The United States of America and the defendant, Jeramiah Caplinger, jointly request to continue the status conference, set for July 9, 2021, approximately 30 days to a date convenient for the Court.¹

As grounds for the motion, the government states that on May 5, 2021, the government filed an Information, charging the defendant with: 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); disorderly conduct in a Capitol building, in violation of 40 U.S.C. § 5104(e)(2)(D); parading, demonstrating, or picketing in a Capitol building, in violation of 40 U.S.C. § 5104(e)(2)(G); and climbing on U.S. Capitol Grounds, in violation of 40 U.S.C. § 5104(d). Since that date, the government has produced discovery to the defendant, and the parties are in active plea negotiations.

The parties would request an additional 30 days to finalize a plea agreement. The parties anticipate requesting to change the status conference to a Rule 11 hearing.

The parties would further request that the Court exclude the period from July 9, 2021 to

¹ The government respectfully requests a date outside of the week of August 9, 2021. The government will be on trial for one week.

the new date for a status conference, finding that the ends of justice served by excluding the period of this continuance outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A).

Sincerely,

JERAMIAH CAPLINGER,

CHANNING D. PHILLIPS
Acting United States Attorney

/s/ James Gerometta (by LS)
James Gerometta
Assistant Federal Defender
631 Abbott Street
5th Floor
Detroit, MI 48226
Telephone No. (313) 967-5839
James_Gerometta@fd.org

By: /s/ Lucy Sun
Lucy Sun
Assistant United States Attorney
Detailee – Federal Major Crimes
United States Attorney’s Office
for the District of Columbia
Telephone No. (617) 590-9468
Lucy.sun@usdoj.gov