

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

UNITED STATES OF AMERICA :
 :
 v. : CRIMINAL NO. 1-22-cr-38 (CKK)
 :
 JOLENE EICHER :
 :
 _____ :
 :

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

Ms Eicher hereby moves this Court to continue the scheduled status hearing in the above-captioned proceeding, and further to exclude the time 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 interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161. In support of this motion, Ms Eicher states as follows:

1. Jolene Eicher is before the Court charged by Information with violations of one count each of: Entering and Remaining in a Restricted Building, 18 U.S.C. § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building, 18 U.S.C. § 1752(a)(2); Violent Entry and Disorderly Conduct on a Capitol Building, 40 U.S.C. §5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, 40 U.S.C. §5104(e)(2)(G). A hearing is currently set for Friday, 24th June, 2022.
2. The parties are engaged in advanced plea negotiations. Discovery and the plea offer have been provided to Ms Eicher. She is in the process of contemplating the offer and a short continuance would provide the time to allow her to make her final decision. The parties are

optimistic at a final decision and agree that a short two-week extension of time should be adequate to bring this process to conclusion.

3. The parties have discussed a new hearing date. The parties have availability 5th through the 8th July 2022, preferably in the afternoon, should the Court have a convenient opening.
4. The defense agrees that the time limits mandated by 18 U.S.C. § 3161 should be tolled for the period between the continued status hearing and the date agreed upon for the next hearing.

WHEREFORE, for the above reasons, the parties respectfully request that this Court grant this Motion to Continue Status Hearing in the above-captioned proceeding.

Respectfully Submitted,

/s/ Peter A. Cooper

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Joint Motion to Continue Status Hearing and to Exclude Time Under the Speedy Time Act is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 22nd day of June, 2022.

/s/ Peter A. Cooper

Peter A. Cooper

