

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

UNITED STATES OF AMERICA

v.

JOHN DAVID ROSS GOULD,

Defendant.

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Case No. 22-cr-311 (RC)

**STATUS REPORT AND UNOPPOSED MOTION TO CONTINUE PLEA AGREEMENT
HEARING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby submits the following Status Report. The government also respectfully moves the Court to continue the Plea Agreement Hearing scheduled for October 27, 2022 for a period of approximately 30 days, and to exclude the intervening time under the Speedy Trial Act. Defendant, through his counsel, Peter Cooper, does not oppose. In support of the Motion, the government represents:

1. The defendant is before the Court charged in an Information with: Entering and Remaining in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(2); Disorderly Conduct in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(G) (ECF No. 20).

2. Government Counsel requested an adjournment of the Plea Agreement Hearing scheduled for October 27, 2022 due to a personal situation. The Court and Defense graciously agreed.
3. The parties are in communication with the Court about rescheduling the Plea Agreement Hearing for the week of November 28, 2022.
4. The parties believe it is in the interest of justice to toll the Speedy Trial Act pending the change of plea. The parties thus request a tolling of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), based on the factors described in 18 U.S.C. 3161(h)(7)(B)(i), (ii), and (iv), as well as 18 U.S.C. § 3161(h)(1)(G).
5. Therefore, the parties request the October 27, 2022 Plea Agreement Hearing be continued for approximately 30 days, and that there is an exclusion of time under the Speedy Trial Act from October 27, 2022, through the Plea Agreement Hearing.
6. The defendant is out of custody.
7. The defendant concurs with this request.

Respectfully submitted,

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United States Attorney

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