

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

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

MOTION TO CONTINUE STATUS CONFERENCE

The United States of America requests to continue the status conference, set for August 18, 2021, for approximately 3 business days to the week of August 23, 2021, or to a date convenient for the Court. As grounds for the motion, the government states:

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 government has a trial originally expected to begin on August 9, 2021. On August 4, 2021, counsel for the defendant in the government's trial informed the Court that the defendant has a medical issue, which has delayed jury selection to August 11, 2021. The government expects that the trial will continue past August 18, 2021. As a result, the government is requesting a status conference date the following week.

The government would further request that the Court exclude the period from August 18, 2021 to 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).

The defendant assents to the motion.

Sincerely,

CHANNING D. PHILLIPS
Acting United States Attorney

By: /s/ Lucy Sun
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