UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v. : CRIMINAL NO. 1-22-cr-121-1 (TNM)

JARED CANTRELL

____:

CONSENT MOTION TO ADD TRIAL READINESS HEARING

Jared Cantrell hereby moves this Court to add a trial readiness hearing in the above-captioned proceeding. In support of this motion, Mr Cantrell states as follows:

- 1. Jared Cantrell 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 trial is currently set for 4 April 2023.
- 2. The parties are engaged in advanced trial preparations. At present, several motions have been filed impacting the course of trial strategy and are unresolved. Additionally, in discussing with the government how this trial will unfold, it has become apparent several stipulation concerns exist which have the potential to steamline trial, or at the very least would establish consensus between the parties. Essentially, the parties believe having a pre-trial conference will establish "the rules of the game" whereby eliminating any ambiguity as to how we proceed, allowing trial to proceed as efficiently as possible.

3. Government counsel has been consulted on this Motion. Both parties consent to this Motion.

WHEREFORE, for the above reasons, the parties respectfully request that this Court grant this Motion to Add Trial-Readiness 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 Convert Trial to Status 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 March, 2023.

/s/ Peter A. Cooper
Peter A. Cooper