

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

DANIEL SHAW,

Defendant.

CR NO. 22-cr-1 (EGS)

**JOINT NOTICE OF CONSENT TO EXCLUDE TIME UNDER  
THE SPEEDY TRIAL ACT**

The United States of America, through undersigned counsel, and Counsel for Daniel Shaw respectfully submit this joint notice to exclude time under the Speedy Trial Act pursuant to 18 U.S.C. §§ 3161(h)(1)(G), (h)(7)(A), and (h)(7)(B)(iv) from September 21, 2022 until October 25, 2022, the date of the next hearing in this case. In support, the government states as follows:

1. The defendant is charged with misdemeanor offenses relating to his conduct during the breach of the U.S. Capitol on January 6, 2021. *See* Information, ECF No. 12.

2. The case was scheduled for a plea hearing on September 22, 2022. However, due to constraints in the Court's calendar, the plea hearing has been rescheduled for October 25, 2022 at 3 p.m.

3. The Court has directed the parties to file a notice by September 23, 2022 at 5 p.m. indicating whether the parties consent to the exclusion of time under the Speedy Trial Act.

4. Additionally, the government continues to provide the defendant with global discovery, as recently as on or about September 20, 2022.

5. The parties accordingly provide notice to the Court that they consent to the exclusion of time under the Speedy Trial Act, more specifically pursuant to 18 U.S.C. §§

3161(h)(1)(G), (h)(7)(A), and (h)(7)(B)(iv), in the interest of justice from September 21, 2022 until October 25, 2022.

6. The exclusion is necessary to allow the parties and Court time to prepare for and hold the plea hearing scheduled for October 25, 2022. The additional period will also allow the defendant and counsel to continue with their review the voluminous discovery in the case and to prepare for the plea hearing. Therefore, the parties respectfully submit that the ends of justice served by the short exclusion would outweigh the best interest of the public and the defendant in a speedy trial.

WHEREFORE, the parties respectfully move that the time from September 22, 2022 until October 25, 2022 be excluded from computation under the Speedy Trial Act.

Respectfully submitted,

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