UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v. : CRIMINAL NO. 1:22-cr-00184-DLF-1

:

BARRY RAMEY, Defendant.

DEFENDANT BARRY RAMEY'S MOTION TO CONTINUE CURRENT TRIAL DATE

Defendant Barry Ramey, through counsel, respectfully requests that this Court continue the currently scheduled trial date and all pre-trial scheduling deadlines for good cause shown. In support thereof, the Defendant states as follows:

- On April 21, 2022, Mr. Ramey was arrested in his home state of Florida on an arrest warrant issued in the United States District Court for the District of Columbia in connection with a criminal complaint related to January 6, 2021.
- 2. Mr. Ramey filed a motion to revoke the detention order entered by the Florida court.
- This Court ruled against Mr. Ramey's motion to revoke the detention order and affirmed Mr. Ramey's pretrial detention.
- Due to his continued incarceration, Defendant objected to waiving his speedy trial rights.
- The Court set a trial date for Mr. Ramey starting from October 31 to November 4, 2022.
- 6. Plea negotiations have been ongoing during the pendency of this case however, have recently taken a productive turn. Given the impending trial deadlines, pursuing both trial and a potential plea has been more difficult than productive.

7. Defendant will agree to waive his speedy trial rights between this motion and a new

trial date that is set by this Court.

8. A continuance will allow the Defendant to fully evaluate any plea offer and fully

explore all options for a resolution to this matter.

9. Counsels for the Government, Kathryn Fifield and Brian Brady, have indicated to

Defense Counsel that they join in our motion to request a continuance to the current

trial date. Defendant waives objections under the Speedy Trial Act.

Wherefore, Defendant Barry Ramey respectfully requests that the Court vacate the

currently-schedule pre-trial and trial dates and set a status date for this matter.

Respectfully submitted,

Farheena Siddiqui Bv Counsel

/s/ Farheena Siddiqui

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CERTIFICATE OF SERVICE

I hereby certify that a copy of Defendant Barry Ramey's Motion to Continue Trial was served upon counsel of record through ECF on the date of filing.

/s/ Farheena Siddiqui

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