

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

UNITED STATES OF AMERICA	:	Case No. 22-mj-00203 (GMH)
	:	
v.	:	
	:	
JON LIZAK,	:	
	:	
Defendant.	:	

**JOINT MOTION TO CONTINUE AND
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The parties are currently scheduled for a status hearing on April 18, 2022. The United States of America and counsel for the defendant, Jon Lizak, hereby move this Court for an approximately 60-day continuance of that hearing and to exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*. In support of this joint motion, the undersigned states as follows:

1. Defendant was charged by complaint for misdemeanor violations related to his actions on January 6, 2021. He was arrested on September 12, 2022. Defendant is not in custody.

2. Both case specific and global discovery have been provided to Defendant, which has included filesharing of documents produced to Relativity. The production to Relativity included numerous audio files and other records of the U.S. Capitol Police, tens of thousands of tips and related documentation made to the Metropolitan Police Department tipline, and FBI reports of interviews, among other materials. Defense counsel continues to review discovery and further investigate this matter. Additionally, the parties continue to discuss a pretrial resolution of this matter.

3. Given defense counsel’s interest in reviewing the voluminous discovery materials

and the Government's pretrial offer, the parties seek an additional continuance of approximately 60 days or another date thereafter at the Court's convenience.

4. Additionally, the parties are in discussions to resolve this matter. The additional time will afford defense counsel time to review documents expected to be provided to him and discuss it with Lizak accordingly.

WHEREFORE, the parties respectfully request that this Court grant the motion for an approximately 60-day continuance of the above-captioned proceeding, and that the Court exclude the time within which and Information, Indictment, or trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. §3161(h)(7)(A), (B)(i), (ii), and (iv), and failure to grant such a continuance would result in a miscarriage of justice.

Respectfully submitted,

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