

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

**UNITED STATES OF AMERICA**

**v.**

**JOHN O’KELLY,**

**Defendant.**

**Case No. 23-cr-61 (ABJ)**

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

The United States, through undersigned counsel, and the defendant John O’Kelly, by and through his counsel Evan Sugar, hereby files this motion to adjourn the status hearing set for Tuesday, May 9, 2023, in the above-captioned matter, for approximately 60 days, until the week of August 28, 2023, the following week, or another date convenient to the Court. The parties request the additional time in order to provide the defense an opportunity to further consider the government’s plea offer<sup>1</sup> and review voluminous discovery, including expected updates to global Capitol Siege discovery.

The parties request that the Court exclude the time from May 9, 2023, until the next status date, pursuant to 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).

Counsel for defendant John O’Kelly has reviewed and joins this motion.

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<sup>1</sup> The deadline by which the defendant must respond to the government’s plea offer was recently extended to August 18, 2023. No additional extensions to the current offer will be granted.

Respectfully submitted,

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