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## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Case No.: 1:21-cr-00354 RCL

V.

CONSENT MOTION TO CONTINUE MARCH 7, 2023, STATUS HEARING AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT

RICHARD SLAUGHTER and CADEN PAUL GOTTFRIED,

Defendants.

COMES NOW, Richard Slaughter, Caden Paul Gottfried, through counsel, to respectfully move this Court for a 30 day continuance of the Status Conference set for March 7, 2023, and further to exclude the time within which the 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). In support of its motion, the Government states as follows:

- 1. The defendants are charged with offenses related to crimes that occurred at the United States Capitol on January 6, 2021.
- 2. A status conference was held in this matter on January 31, 2023, at which time the case was continued to March 7, 2023, to permit the government to complete discovery and permit plea negotiations.

United States v. Jared Adams Case No. 1:21-cr-00212 ABJ-1

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- 3. Counsel is still in the process of reviewing discovery with the defendants. Additionally, counsel has had difficulties accessing discovery on Evidence.com.
- 4. The defendants are considering the government's plea offer and require additional time to review the plea documents.
  - 5. The government consents to this motion.
- 6. Accordingly, the parties respectfully request that this Court grant the motion to continue the Status Hearing set for March 7, 2023, for an additional 30 days from the date this Court enters an Order on this motion through and including the date of the next hearing, and that the Court exclude the time within which the 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 Defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

WHEREFORE counsel respectfully requests that this motion be granted.

Dated: February 24, 2023

Joseph R. Conte, Bar #366827 Counsel for Richard Slaughter and Caden Paul Gottfried Law Office of J.R. Conte 8251 NW 15th Ct. Coral Springs, FL 33071

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United States v. Jared Adams Case No. 1:21-cr-00212 ABJ-1

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