

3. The government and counsel for the defendant have conferred, and are continuing to communicate in an effort to resolve this matter. The large number of cases that are pending and related to the events of January 6, 2021, as well as the unique discovery challenges that are presented by such an unprecedented, large-scale investigation, have slowed this process.

9. The parties, therefore, would respectfully request that the Status Hearing be continued until a date on or after March 4, 2021. Consistent with Standing Order No. 20-93, and for the reasons stated above, the parties agree that the interests and ends of justice are best served and outweigh the interests of the public and the defendant in a speedy trial, and that this adjournment will allow the parties to continue negotiations in an effort to achieve a resolution before trial. Therefore, the parties agree that pursuant to 18 U.S.C. § 3161, the time from February 11, 2021 through the next court date shall be excluded in computing the date for speedy trial in this case.

