

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

LAURA STEELE

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CASE NO. 1:21-cr-00028-7-APM

**DEFENDANT’S MOTION TO JOIN AND ADOPT CO-DEFENDANT’S OPPOSITION TO
GOVERNMENT’S MOTION TO CONTINUE AND EXCLUDE TIME UNDER THE SPEEDY
TRIAL ACT**

Laura Steele, through undersigned counsel, requests and seeks leave for the Court to allow her to join and adopt her co-defendant’s Opposition to Government’s Motion to Continue and Exclude Time Under the Speedy Trial Act. In support of this request, Ms Steele states the following:

1. Ms Steele is before the court charged with one count each of: Conspiracy, in violation of 18 U.S.C. §371; Obstruction of an Official Proceeding and Aiding and Abetting in violation of 18 U.S.C. §§1512(c)(2); Destruction of Government Property and Aiding and Abetting in violation of 18 U.S.C. §§1361; and Entering Restricted Building or Grounds in violation of 18 U.S.C. §1752 (a)(1). Ms Steele has a detention hearing set for 24 March 2021 specific to her matter, and a general status hearing set for 6 April 2021 with her co-defendants.

2. On 12 March, 2021, the government filed a Motion for Extension of Time to Schedule Trial (Motion to Designate Case Complex and Exclude Time Under the Speedy Trial Act). The same day, the Court issued a Minute Order referencing defence responses to be filed by 17 March, 2021. At that time Ms Steele had not been arraigned.

3. On 16 March, 2021, Ms Steele appeared before this Court and was arraigned on the above referenced charges. At that hearing, the Court reminded counsel for Ms Steele of the due date imposed in its Minute Order of the 12 March on this issue¹.

4. On 17 March, 2021, counsel for Ms Steele's co-defendant Graydon Young filed an Opposition to the Government's Motion. In reviewing Mr Graydon's Opposition, it is noted by counsel for Ms Steele that her situation with respect to pretrial detention and a right to a speedy trial is identical to that of Mr Young. Ms Steele concurs in all the arguments brought to the Court by Mr Young, and asserts that the constitutional and legal arguments discussed in Mr Young's pleading apply equally and as forcibly to Ms Steele's situation. In essence the only difference in any original pleading by Ms Steele on this issue and Mr Young's would be changing the name on the pleading. There are no new or novel legal issues that differentiate Ms Steele's position on this issue than that of Mr Young.

WHEREFORE, on the basis of judicial economy, and seen in light of the rapid scheduling of Ms Steele's detention pleadings, Ms Steele requests this Honourable Court allow her to Join and Adopt her co-defendant's Opposition to Government's Motion to Continue and Exclude Time Under the Speedy Trial Act.

Respectfully Submitted,

/s/ Peter A. Cooper

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¹ At the same hearing, the Court set deadlines for defence pleadings with respect to pretrial detention due on 18 March 2021.

Counsel for Laura Steele

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Notice of Appearance is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 17th day of March, 2021.

/s/ Peter A. Cooper

Peter A. Cooper