

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

**UNITED STATES OF AMERICA**

**v.**

**CHRISTOPHER GRIDER,**

**Defendant.**

**Case No. 1:21-cr-22 (CKK)**

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE SENTENCING MEMORANDUM**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully moves this Court for a 7-day extension of time—from April 7, 2023, until April 14, 2023—to file the government’s sentencing memorandum. The government further respectfully requests that, if the government’s extension request is granted, the defendant’s time to file his sentencing memorandum also be extended by 7 days, from April 28, 2023, to May 5, 2023. Good cause exists for the extension requested in this motion:

1. On June 1, 2022, a federal grand jury returned a superseding indictment charging the defendant with nine counts: (1) Civil Disorder, in violation of 18 U.S.C. § 231(a)(3) (Count One); (2) Obstruction of an Official Proceeding and Aiding and Abetting, in violation of 18 U.S.C. § 1512(c)(2) (Count Two); (3) Destruction of Government Property, in violation of 18 U.S.C. § 1361 (Count Three); (4) Entering and Remaining in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(1) (Count Four); (5) Disorderly and Disruptive Conduct in a Restricted Building or Grounds, in violation 18 U.S.C. § 1752(a)(2) (Count Five); (6) Engaging in Physical Violence in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(4) (Count Six); (7) Disorderly Conduct in a Capitol Building, in violation of 40 U.S.C.

§ 5104(e)(2)(D) (Count Seven); (8) Act of Physical Violence in the Capitol Grounds or Buildings, in violation of 40 U.S.C. § 5104(e)(2)(F) (Count Eight); and (9) Parading, Demonstrating, or Picketing in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(G) (Count Nine).

2. In December 2022, following guilty pleas on two counts and a bench trial on the remaining counts, the defendant was convicted on all counts. The Court then scheduled a sentencing hearing for May 23, 2023, and set deadlines of April 7, 2023, and April 28, 2023, respectively, for the government's and the defendant's sentencing memoranda.

3. I am the attorney responsible for preparing the government's sentencing memorandum and for representing the government at sentencing. In recent weeks, I have been responsible to handle an unusually large number of complex matters with competing deadlines. I accordingly need additional time to finalize a sentencing memorandum that will best assist the Court in sentencing the defendant. These competing obligations have included:

- (i) Between February 28, 2023, and March 16, 2023, I represented the government at trial in *United States v. Vitali Gossjankowski*, No. 1:21-cr-123 (PLF);
- (ii) On March 21, 2023, I represented the government at a sentencing hearing in *United States v. Anthony Puma*, No. 1:21-cr-454 (PLF);
- (iii) Starting on April 17, 2023, I will represent the government at trial in *United States v. David Charles Rhine*, No. 1:21-cr-687 (RC), a trial that is expected to last up to five days; and
- (iv) I am responsible for preparing the government's response to the petition for a writ of certiorari in *Segundo Marcial Dominguez-Caicedo et al. v. United States*, Nos. 22-6461 et al. (U.S.), which is currently due on or before May 1, 2023.

4. An extension of time until April 14, 2023, would allow adequate time for the government to finalize its sentencing memorandum in this case while managing the competing obligations described above.

5. The government further requests that, if its request for a 7-day extension is granted, the deadline for the defendant's sentencing memorandum also be extended by 7 days, from April 28, 2023, to May 5, 2023.

6. If the extensions requested in this motion are granted, the parties' sentencing briefing would be complete 18 days in advance of sentencing, which is scheduled for May 23, 2023.

7. I have conferred with Brent Mayr, counsel for the defendant, about this motion. Mr. Mayr indicated that the defendant does not object to the extension of time sought in this motion.

WHEREFORE, the United States respectfully moves that the time for the government to file its sentencing memorandum in this case be extended from April 7, 2023, to April 14, 2023, and that the time for the defendant to file his sentencing memorandum be extended from April 28, 2023, to May 5, 2023.

April 4, 2023

Respectfully submitted,

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