

DISTRICT JUDGE JAMES E. BOASBERG

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

7	UNITED STATES OF AMERICA,)	No. CR21-352-JEB
8	Plaintiff,)	
9	vs.)	UNOPPOSED MOTION TO EXTEND
10	MARC BRU,)	DEADLINE FOR MOTIONS
11	Defendant.)	
12)	

13 Marc Bru, by his attorney, Assistant Federal Public Defender Gregory Geist,
14 requests that the due date for pretrial motions and motions in limine be extended from
15 February 3, 2023, to February 17, 2023, pursuant to Local Criminal Rule 57.2(b).
16 Assistant United States Attorney Michael Gordon does not oppose this request. In
17 support of this motion, counsel for Mr. Bru states:

18 On March 9, 2021, Mr. Bru was charged in a criminal Complaint. Dkt. 1. He
19 made an initial appearance on April 9, 2021, and was placed on personal recognizance
20 under the terms of an appearance bond. Dkt. 7. An indictment was filed on May 12,
21 2021. Dkt. 12. A superseding indictment was filed on December 1, 2021, charging with
22 Mr. Bru with Entering and Remaining in a Restricted Building or Grounds, in violation
23 of 18 U.S.C. § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building
24 or Grounds, in violation of 18 U.S.C. § 1752(a)(2); Entering and Remaining in the
25 Gallery of Congress, in violation of 40 U.S.C. § 5104(e)(2)(B); Disorderly Conduct in a
26 Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(D); Parading, Demonstrating,

1 or Picketing in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(G); Civil
2 Disorder, in violation of 18 U.S.C. § 231(a)(3); and Obstruction of an Official
3 Proceeding and Aiding and Abetting, in violation of 18 U.S.C. §§ 1512(c)(2) and 2.
4 Dkt. 31.

5 Undersigned counsel made a notice of appearance on May 27, 2022. Dkt. 42. On
6 October 14, 2022, the Court set a jury trial for April 17, 2023, with motions in limine
7 due by February 3, 2023, responses due by February 17, 2023, and replies due by
8 February 24, 2023.

9 The government has offered Mr. Bru a potential resolution and is putting
10 together a formalized offer for Mr. Bru's review and consideration. In light of the
11 upcoming receipt of a formalized offer and a desire to preserve government and Court
12 resources, undersigned counsel requests an extension, unopposed by the government, of
13 the deadline for pretrial motions and motions in limine for two weeks, to February 17,
14 2023, with corresponding extensions for responses and replies.

15 DATED this 3rd day of February 2023.

16 Respectfully submitted,

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18 *s/ Gregory Geist*
19 Assistant Federal Public Defender
20 Attorney for Marc Bru
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