

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : CRIMINAL NO. 1:22-CR-40  
:  
:  
V. :  
:  
:  
SANDRA WEYER : (JUDGE BOASBERG)  
:  
:

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE MOTIONS IN  
LIMINE**

AND NOW, this 16th day of March, 2023, comes the Defendant, Sandra Weyer, by and through her attorney Jonathan W. Crisp, Esquire and hereby requests this Honorable Court grant her Unopposed Motion for Extension of Time to File Motions in Limine. In support of said motion the following is averred:

1. The Defendant was indicted on 2 February 2022, and charged with the following:
  - a. Count 1: Obstruction of an Official Proceeding and Aiding and Abetting;<sup>1</sup>
  - b. Count 2: Entering and Remaining in a Restricted Building or Grounds;<sup>2</sup>
  - c. Count 3: Disorderly and Disruptive Conduct in a Restricted Building or Grounds;<sup>3</sup>
  - d. Count 4: Disorderly Conduct in a Capitol Building;<sup>4</sup>
  - e. Count 5: Parading, Demonstrating, or Picketing in a Capitol Building;<sup>5</sup>

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<sup>1</sup> 18 USC §§ 1512(c)(2), and 2  
<sup>2</sup> 18 USC § 1752(a)(1)  
<sup>3</sup> 18 USC § 1752(a)(2)  
<sup>4</sup> 40 USC § 5104(e)(2)(D)  
<sup>5</sup> 40 USC § 5104(e)(2)(G)

2. On 8 February 2022, the Defendant entered a plea of not guilty to the indictment before the Honorable Emmet G. Sullivan, U.S. Senior Judge.
3. Defendant retained Attorney Nicholas D. Smith on 28 February 2023.
4. Motions in limine are due on 17 March 2023.
5. Due to undersigned counsel and Attorney Smith both being in trial following his being retained, counsel have been unable to confer with each other or with Defendant regarding motions. Additionally, Attorney Smith needs additional time to review the evidence in the case to provide adequate counsel.
6. Thus, undersigned counsel is requesting an extension of time of two weeks to file any motions in limine.
7. Undersigned counsel has received concurrence from Assistant United States Attorney Jennifer Blackwell for instant motion.
8. Undersigned counsel respectfully requests that this Honorable Court attribute any delay under the Speedy Trial Act to the defense.

9. Under the Speedy Trial Act, delay resulting from any pretrial motion, from the filing of the motion through the conclusion of the hearing, or other prompt disposition of such motion, shall be excluded in computing the time within which trial must be commenced. See 18 U.S.C. § 3161(h)(1)(D).

WHEREFORE, it is respectfully requested that the Court grant the Defendants' Motion for Extension of Time to File Motions in Limine this case.

Date: 16 March 2023

Respectfully submitted,  
**CRISP AND ASSOCIATES, LLC**  
/s/ Jonathan Crisp  
Jonathan W. Crisp, Esquire  
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Attorney for Defendant

**CERTIFICATE OF CONCURRENCE**

I, Jonathan W. Crisp, Counsel for Defendant, Sandra Weyer, hereby certifies that Assistant United States Attorney, Jennifer Blackwell, has no objections to the foregoing Motion.

Date: 16 March 2023

/s/ Jonathan Crisp  
Jonathan W. Crisp, Esquire

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served on the individual listed below:

**ELECTRONIC SERVICE**

Jennifer Blackwell, Esquire  
US ATTORNEY GENERAL'S OFFICE/DC  
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Date: 16 March 2023

/s/ Jonathan Crisp  
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