

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 1-21-CR-233-(EGS)
	:	
WILLIAM NORWOOD	:	
	:	
_____	:	

JOINT MOTION TO AMEND BRIEFING SCHEDULE AND TO CONTINUE STATUS

The parties hereby move this Court to amend the briefing schedule and to continue the upcoming status hearing in the above-captioned proceeding, and further to exclude the time under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161. In support of this motion, the parties state as follows:

1. Mr Norwood is before the court charged with one count each of: Obstruction of an Official Proceeding in violation of 18 U.S.C. §1512(c)(2); Theft of Government Property in violation of 18 U.S.C. §641; and Entering and Remaining in Restricted Building or Grounds in violation of 18 U.S.C. §1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building or Grounds in violation of 18 U.S.C. §1752 (a)(2); Entering and Remaining in Certain Rooms in the Capitol Building in violation of 40 U.S.C. §5104(e)(2)(C); Disorderly Conduct in a Capitol Building in violation of 40 U.S.C. §5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building in violation of 40 U.S.C. §5104(e)(2)(G). A hearing is currently set for 23 February, 2022.

2. At the outset of this case, Mr Norwood was detained. Following the filing of a Bond Review Motion and subsequent bond hearing, Mr Norwood was released by this Court on 20 April,

2021. On 13 January, 2022. Based on allegations of violations of conditions of release, the government filed a Motion to Revoke Defendant's Pretrial Release. At a previously scheduled status hearing also on 13 January, 2022, the Court addressed the issue of the alleged violations, but declined to act at that time giving the defence the opportunity to respond in writing. The Court provided a briefing schedule where a defence opposition to the government's motion would be due 2 February 2022, followed by a potential government reply due 9 February, 2022. A further status was set of 23 February, 2022, before this Court.

3. On 1 February, 2022, the government informed counsel that it had received additional materials pertinent to the revocations issue. Government counsel provided the materials and indicated the materials were voluminous in nature. Given this, the parties agreed the current briefing schedule was impractical and agreed to reach out to the Court with a new proposed schedule. The parties now contemplate a briefing schedule whereby government will file a supplemental memorandum in support of revocation due 17 February, defence opposition will be due 24 February, with government reply being due 3 March, 2022.

4. As this briefing schedule proposal extends past the currently scheduled status hearing on 23 February, 2022, the parties move the Court to continue the status hearing accordingly, The parties suggest a date of 7 March, 2022, for a new status date. With respect to Speedy Trial Act concerns, the defence agrees that the time limits mandated by 18 U.S.C. § 3161 are tolled for the new period up to this new proposed date of 7 March, 2022.

WHEREFORE, for the above reasons, the parties respectfully request that this Court grant this Joint Motion to Amend Briefing Schedule and Continue Status in the above-captioned proceeding.

Respectfully Submitted,

PeterCooperLaw

/s/ Peter A. Cooper

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Joint Motion to Amend Briefing Schedule and Continue Status is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 2nd day of February, 2022.

/s/ Peter A. Cooper

Peter A. Cooper

PeterCooperLaw