

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BRADY KNOWLTON,

Defendant

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Case No. 21-CR-00046-RDM-2

DEFENDANT BRADY KNOWLTON'S
STATUS REPORT REGARDING TRIAL DATES

TO THE HONORABLE RANDOLPH D. MOSS, UNITED STATES DISTRICT
JUDGE FOR THE DISTRICT OF COLUMBIA:

COMES NOW DEFENDANT Brady Knowlton, by and through undersigned counsel, and submits the following Status Report as ordered by this Court on May 20, 2022. More specifically, this Court ordered counsel for Mr. Knowlton to confer with counsel for the Government and the Courtroom Deputy Clerk regarding a potential trial date and file a status report on or before May 27, 2022. While Mr. Knowlton made all reasonable efforts to prepare and submit a joint status report, the Government has elected to file its own status report; Mr. Knowlton accordingly is submitting this report on his own.

1. First, and foremost, it should be noted that this report relates to Mr. Knowlton only and his present desire to proceed to trial before a jury. Co-defendant Patrick Montgomery, as reflected in the previous status report filed with this Court, does not want a speedy trial and is not ready for his case to proceed to trial. See ECF Dkt. No. 100.

2. Although the Government maintains that a trial for one is a trial for both, Mr. Knowlton insists that this Court schedule a trial in his case now and, when appropriate, decide on its own whether Mr. Montgomery should join him at trial or not.
3. With those positions in mind, Mr. Knowlton first sets out what he and the Government agree upon: the expected length of the trial. Both the Government and Mr. Knowlton expect trial in this case to last 5 to 6 days.
4. As for availability, counsel for Mr. Knowlton are available for trial anytime in October, the first part of December up until December 23, and all of February 2023.
5. As for counsel for the Government, they initially indicated that they had trials scheduled in July, August, September, and November of this year (Ms. Kelley had trials scheduled in July, September, and November; Mr. Peterson had trials scheduled in July, August, September, and March of 2023). Ms. Kelley subsequently indicated that she was not available in October. And, as of today, she indicated that she is not available in December and that Mr. Peterson just had a trial scheduled for January 13, 2023.
6. All counsel conferred with this Court's courtroom deputy who informed the parties that the Court is booked for trials every month through the beginning of December and that the next available dates to begin a trial are December 13, 2022, January 5, 2023 or February 22, 2023.

7. With the Court's availability in mind, Mr. Knowlton is requesting this Court schedule trial for December 13. The Government, on the other hand, is requesting February 22.
8. Mr. Knowlton believes it is prudent to set his case for trial on December 13 because there is no guarantee that Ms. Kelley will proceed to trial as scheduled in November in her other case. Stated differently, Mr. Knowlton does not want for Ms. Kelley's other trial scheduled in November to not proceed as scheduled and thus he loses out on the opportunity to proceed to trial in December. If Ms. Kelley is still in trial as the proposed December trial date approaches, Mr. Knowlton will not oppose a motion to continue.

WHEREFORE, PREMISES CONSIDERED, Mr. Knowlton respectfully requests this Honorable Court set his case for trial on December 13, 2022.

Date: May 27, 2022

Respectfully Submitted,

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ATTORNEYS FOR THE DEFENDANT,
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the
Government on May 27, 2022, via CM/ECF.

/s/ T. Brent Mayr
Brent Mayr
Attorney for Brady Knowlton