

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

UNITED STATES OF AMERICA,)
)
 v.) **No. 21-091 (RCL)**
)
ISAAC STEVE STURGEON,)
)
 Defendant.)
_____)

UNOPPOSED MOTION TO CONTINUE TRIAL

Defendant, Isaac Sturgeon, through counsel, respectfully requests that the Court grant a continuance of the currently scheduled trial date of May 15, 2023.

- (1) Mr. Sturgeon was indicted on February 5, 2021, for one count of Obstruction of an Official Proceeding and Aiding and Abetting in violation of 18 U.S.C. §1512(c)(2) and (2), one count of Assaulting, Resisting, or Impeding Certain Officers in violation of 18 U.S.C. §111(a)(1), one count of Civil Disorder in violation of 18 U.S.C. §231(a)(3), one three counts of 18 U.S.C. §1752(a)(1)(2), and (4), and one count of 40 U.S.C. §5104(e)(2)(E) . *See* ECF Dkt. No. 3.
- (2) Mr. Sturgeon was arrested on March 6, 2021 at the John F. Kennedy Airport in Queens, New York. *See* ECF Dkt. No. 14.
- (3) He was released on that day and to this date, has been compliant with all of his pre-trial release conditions and has appeared for all of his court proceedings.
- (4) On August 9, 2022, the Court held a status hearing where it set a jury trial date for May 15, 2023.
- (5) Unfortunately, since that time, several unavoidable conflicts have arisen for

undersigned counsel that conflict with the currently scheduled trial date.

- (6) Furthermore, Mr. Sturgeon is considering moving forward with a bench trial versus a jury trial and has not made a final decision yet.
- (7) Lastly, there are outstanding motions that will greatly impact the direction of the case as well as potential defenses.
- (8) For all of these reasons, counsel respectfully requests that the Court grant a continuance of the currently scheduled trial and to set a status conference to discuss alternative dates.
- (9) Counsel has discussed this request with counsel for Mr. Bingert, who consents to this request. Counsel has also discussed this request with government counsel, who does not oppose this request.
- (10) This is the first defense request for a continuance of the trial and is not done for the purpose of delay and is made in good faith.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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