

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

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
v.	:	<b>No. 1:21-cr-00447-CJN-03</b>
	:	
<b>JOSHUA CHRISTOPHER DOOLIN,</b>	:	
et al.	:	

**DEFENDANT JOSHUA CHRISTOPHER DOOLIN'S CONSENT  
MOTION FOR LEAVE TO FILE OUT OF TIME: (1) MOTION IN LIMINE  
TO PRECLUDE THE INTRODUCTION OF ANY EVIDENCE OR  
TESTIMONY REGARDING WEAPONS AMMUNITION AND BODY ARMOR,  
AND (2) MOTION TO DISMISS COUNT EIGHTEEN OF THE  
SUPERSEDING INDICTMENT**

COMES NOW Defendant, Joshua Christopher Doolin, by and through undersigned counsel, hereby respectfully moves this Honorable Court, for the entry of an Order permitting counsel to file out of time the following: (1) Motion in Limine To Preclude the Introduction of Any Evidence or Testimony Regarding Weapons Ammunition and Body Armor, and (2) Motion to Dismiss Count Eighteen of the Superseding Indictment. As grounds, the following is stated:

1. This Motion is consented to per Assistant U.S. Attorney Benet Kearney.
2. On May 27, 2022, the Court instructed counsel to file any additional pre-trial motions and motions *in limine* by July 22, 2022.

3. Due to counsel's other professional obligations and responsibilities, it was not possible to file additional pre-trial motions and motions *in limine* by July 22, 2022.

4. Furthermore, on July 13, 2022, a Superseding Indictment (Doc. 116) issued alleging three additional violations of federal criminal law. Count Eighteen of the Superseding Indictment, alleges a violation of 21 U.S.C. § 231(a)(3) – “Civil Disorder.”<sup>1</sup> Counsel now seeks leave of Court to file a Motion to Dismiss Count Eighteen of the Superseding Indictment.

WHEREFORE, for the foregoing reasons and such other reasons which may appear just and proper, Joshua Christopher Doolin, by and through undersigned counsel, hereby respectfully moves this Honorable Court, for the entry of an Order permitting counsel to file out of time the following: (1) Motion in Limine To Preclude the Introduction of Any Evidence or Testimony Regarding Weapons Ammunition and Body Armor, and (2) Motion to Dismiss Count Eighteen of the Superseding Indictment.

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<sup>1</sup> Count 16 – Theft in a Federal Enclave, in violation of 18 U.S.C. § 661, and Count 17 – Theft of Government Property, in violation of 18 U.S.C. § 641, Both of these Counts are misdemeanors.

Respectfully submitted,

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Dated: July 24, 2022