

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

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

MOTION TO CONTINUE TRIAL DATE

Joshua Christopher Doolin, by his undersigned counsel, hereby moves to continue his trial set to begin on September 12, 2022, to a date sometime in The following is stated in support thereof.

1. Mr. Doolin is requesting the Court to continue his case until the early part of 2023. It is submitted that the to the ongoing publicity from: (1) the nationally televised House Select Committee Hearings on the events of January 6th and its anticipated final report (expected to be issued at the end of 2022, and (2) the recent revelations that U.S. Secret Service (and other U.S. government) cell-phone text messages, etc., were deleted. He submits that the prejudicial publicity to date, finding fault on the part of anyone connected to the events of January 6, creates an atmosphere of intense personal opinions and biases that will be difficult, if not impossible, to weed out during the voir dire process. Furthermore, the mid-term elections will only further polarize and inflame the populace; in particular, the politically sensitive citizens of the District of Columbia. Finally, the report that will

be issued by the Committee summarizing their findings is expected at the end of the year and will again fan the flames of individuals' personal opinions and biases.

Also, there is heightened pre-trial publicity stemming from U.S. Secret Service (and other U.S. government) cell-phone text messages investigation. All factors considered, Mr. Doolin moves to continue his trial until 2023, in order to obtain a to obtain a less politically charged jury pool.

2. With respect to both the anticipated House Select Committee and the results of the U.S. Secret Service (and other U.S. government) cell-phone text messages investigation, there may be disclosed *Brady* information and/or other information which may be important to the defense of this case.

3. Mr. Doolin is prepared to waive time under the Speedy Trial Act until such time as his trial commences.

4. It is counsel's understanding the government opposes the request to continue the trial of this matter, unless it is re-scheduled for March 6, 2023 – which is the trial date for the (former) co-defendants in 21-447-CJN. To be clear, Mr. Doolin is not requesting that his trial be re-connected to the other co-defendants for the purposes of a trial. He wants to have his trial separate and apart from the other co-defendants. Furthermore, it is counsel's understanding that the government may file a written opposition to this motion to continue on the grounds of pretrial publicity.

5. A hearing is requested on this motion.

WHEREFORE, for the foregoing reasons and such other reasons which may appear just and proper, Joshua Christopher Doolin hereby moves to continue his trial set to begin on September 12, 2022, to a date sometime in 2023.

Respectfully Submitted,

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