

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

<b>UNITED STATES OF AMERICA</b>	)	
	)	<b>Criminal No. 21-80 (BAH)</b>
<b>v.</b>	)	<b>Chief Judge Howell</b>
	)	<b>Status: November 19, 2021</b>
<b>MATTHEW BLEDSOE</b>	)	

**CONSENT MOTION TO CONTINUE STATUS CONFERENCE**

COMES NOW the defendant, Matthew Bledsoe, by and through undersigned counsel, and respectfully moves this Honorable Court to continue the status conference in this case from November 19, 2021 to a date approximately 60 days out that is agreeable to the Court and the parties.

1. The next status conference in this case is scheduled for November 19, 2021.
2. Mr. Bledsoe and the government are in plea negotiations. Towards this end, Mr. Bledsoe and the government are in the process of scheduling a reverse-proffer session.
3. The government has already turned over and made available to Mr. Bledsoe a considerable amount of the Rule 16 discovery for this case. While undersigned counsel feels that he has a good sense of the government's case against Mr. Bledsoe, the amount of discovery that the government has turned over and made available to Mr. Bledsoe is voluminous, and undersigned counsel is still in the process of reviewing it. Additionally, there is still some discovery that has not yet been turned over and made available.
4. Mr. Bledsoe is charged by indictment with five counts: 1) Obstruction of an Official Proceeding (18 U.S.C. § 1512(c)(2)), 2) Entering and Remaining in a Restricted Building (18 U.S.C. § 1752(a)(1)), 3) Disorderly and Disruptive Conduct in a Restricted

Building or Grounds (18 U.S.C. § 1752(a)(2)), 4) Disorderly Conduct in a Capitol Building (40 U.S.C. § 5104(e)(2)(D)), and 5) Parading, Demonstrating, or Picketing in a Capitol Building (40 U.S.C. § 5104(e)(2)(G)).

5. The current plea agreement under discussion involves Mr. Bledsoe pleading guilty to the lead count of the indictment: Obstruction of an Official Proceeding (18 U.S.C. § 1512(c)(2)). Attacks on this charge have been mounted by motion in several other January 6 cases. Some of these cases are:

- a. United States v. Sandlin, 21-cr-88 (DLF)
- b. United States v. Montgomery, 21-cr-46 (RDM)
- c. United States v. Caldwell, 21-cr-28 (APM)
- d. United States v. Nordean, 21-cr-175 (TJK)

Undersigned counsel is familiar with the arguments being made by the other January 6 defendants in their motions attacking their charges under 18 U.S.C. § 1512(c)(2) in the above cases. The arguments address the applicability of § 1512(2) to the type of conduct that the January 6 defendants are charged with. The arguments raised in the motions are non-frivolous and apply with equal force to the § 1512(c)(2) count that Mr. Bledsoe is charged with. The arguments raised in the motions are novel, and there have as of yet been no rulings on the motions. Also, there are no appellate opinions that counsel is aware of that shed light on the issues raised in the motions. The current state of uncertainty about the applicability of 18 U.S.C. § 1512(c)(2) to the conduct that Mr. Bledsoe and the other January 6 defendants are charged with complicates plea negotiations to some extent.

6. On November 17, 2021, undersigned counsel spoke by phone with Assistant United States Attorney Jamie Carter. Ms. Carter graciously indicated that the government does not oppose this motion to continue the status conference in this case.

7. On November 17, 2021, undersigned counsel exchanged e-mails with Paul J. Bruno, counsel for Blake Reed. Mr. Bruno graciously indicated that Mr. Reed does not oppose this motion to continue the status conference in this case.

8. If this motion to continue the status conference is granted, Mr. Bledsoe agrees to toll time under the Speedy Trial Act, 18 U.S.C. § 3161, until the new status-conference date.

WHEREFORE, the defendant, Matthew Bledsoe, moves this Honorable Court to continue the status conference in this case from November 19, 2021 to a date approximately 60 days out that is agreeable to the Court and the parties.

Respectfully submitted,

/s/

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