

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

PATRICK MONTGOMERY,
BRADY KNOWLTON, and
GARY WILSON

Defendants

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Case No. 21-CR-00046-RDM

JOINT MOTION TO CONTINUE TRIAL AND
SUSPEND RELATED DEADLINES

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

PATRICK MONTGOMERY, BRADY KNOWLTON, and GARY WILSON, the Defendants in the above styled and numbered cause, by and through their respective, undersigned counsel, joined by counsel for the United States, respectfully move this Court to continue the trial presently scheduled for October 16, 2023, suspend all presently scheduled deadlines and hearings, and set this matter for a status hearing as soon as possible to discuss future settings related to the case. In support thereof, the parties would show the following.

In the process of preparing for the upcoming trial, the Defendants initiated communication with the Government to discuss the possibility of the Defendants waiving their rights to a jury trial and proceeding with a stipulated trial before the Court where the Defendants would not contest the evidence used by the Government to establish their guilt as to certain offenses. The Government responded favorably

and all parties agreed that it would be in the best interests of all parties, as well as the best interests of justice, to request this Court continue the presently scheduled trial date and suspend all presently scheduled deadlines and hearings in order to eliminate the need to spend further time and resources preparing for a jury trial in light of the Defendants' position. In accordance with this request, the Defendants agree to continue waiving their rights to a speedy trial.

In the event that this Court grants this motion, the parties would respectfully request that this Court schedule a status hearing as soon as possible to discuss certain factors that are impacting the Defendants' ultimate decision and to discuss future settings related to the case.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request this Court grant their requested relief.

Respectfully Submitted,

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CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for the Government, Kelly Moran and Carolina Nevin, on September 14, 2023, and they confirmed that they wished to join in this motion.

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

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the Government, Kelly Moran and Carolina Nevin on September 14, 2023, via CM/ECF and email.

/s/ T. Brent Mayr
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