IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	**CRIMINAL NO. 21-CR-117 (RCL)**
	:	
	:	
ALEX HARKRIDER	:	

DEFENDANT'S MOTION FOR CONTINUANCE OF TRIAL DATE

Mr. Alex Harkrider, through his attorney, Kira Anne West, respectfully requests that this Honorable Court grant a short continuance to allow Mr. Harkrider to call Mr. Ryan Nichols, the co-defendant in this case, for his defense. Mr. Nichols is a critical fact witness in fact one of the only fact witnesses that can testify to all material facts in the case as he was with Mr. Harkrider the entire time. Many of these facts will be exculpatory in nature. Mr. Nichols is set to plead guilty in this Court sometime around the November 8, 2023, trial date. The expectation is that he would be sentenced sometime in January, 2024. Mr. Nichols' lawyers have informed undersigned counsel that Mr. Nichols will not testify for Mr. Harkrider until after Mr. Nichols has been sentenced by this Court, but is willing to do so once he is sentenced. As this Court knows, Mr. Nichols does have a 5th amendment right to remain silent through sentencing.

Mr. Harkrider files this motion not to delay the trial unnecessarily, but so that Mr. Harkrider's constitutional rights will be preserved and he can present an adequate and forceful defense to the charges. The government opposes this motion.

Respectfully submitted,

KIRA ANNE WEST

By /s/ *Kira A. West*

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CERTIFICATE OF SERVICE

I hereby certify on the 19th day of October, 2023, a copy of same was delivered to the parties of record, by email pursuant to the rules of the Clerk of Court.

/S/ *Kira West*

Kira Anne West