

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
	:	
<b>v.</b>	:	<b>No. 21-CR-157 (TNM)</b>
	:	
	:	<b>Trial Date: January 18, 2022</b>
<b>CHRISTIAN SECOR,</b>	:	
<b>Defendant.</b>	:	
<hr/>	:	

**CONSENT MOTION TO EXTEND  
MOTIONS DEADLINES AND CONTINUE TRIAL DATE**

Christian Secor, through counsel, respectfully moves this Court to extend the deadlines for filing pretrial motions and continue the trial date currently scheduled for January 18, 2022.

In support of the motion Counsel states the following:

1. Mr. Secor stands before this court charged with Obstruction of a Congressional Proceeding and Aiding and Abetting, in violation of 18 U.S.C. § 1512(c)(2), § 2; Civil Disorder and Aiding and Abetting, in violation of 18 U.S.C. § 231(a), § 2; Assaulting, Resisting or Impeding Officers and Aiding and Abetting, in violation of 18 U.S.C. § 111(a)(1), § 2; Entering and Remaining in a Restricted Building, in violation of 18 U.S.C. § 1752(a)(1) and (2); and Disorderly and Disruptive Conduct on Capitol Grounds, in violation of 40 U.S.C. §5104(e)(2)(A),(B),(C),(D) and (G).
2. Mr. Secor’s trial is currently scheduled for January 18, 2022.
3. The deadline for Mr. Secor to file pretrial motions is November 22, 2021.
4. On November 10, 2021, the government filed a superseding indictment alleging new information related to the events of January 6, 2021.

5. On November 19, 2021, the government provided a terabyte of discovery that counsel has not had an opportunity to review or incorporate into Mr. Secor's defense.
6. Based on the recent disclosure of voluminous discovery, counsel cannot meet the motions deadline or be ready for trial.
7. There is no objection from the USAO to extending the motions deadlines and continuing the trial date. Pursuant to the Court's November 12, 2021, Minute Order, the parties will file a joint scheduling order by November 29, 2021.

WHEREFORE, Mr. Secor respectfully requests that the Court grant his Motion to Extend Motions Deadlines and Continue the Trial pursuant to the parties November 29, 2021, scheduling order.

Respectfully submitted,

/s/ Brandi Harden

---

Brandi Harden  
Bar No. 470706  
Counsel for Christian Secor  
Harden|Pinckney, PLLC  
400 7th Street Suite 604  
Washington, DC 20004  
bharden@hardenpinckney.com

**CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2021, I caused a copy of the foregoing motion to be served on counsel of record via ECF.

/s/ Brandi Harden

\_\_\_\_\_  
Brandi Harden, Esq.