

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

**UNITED STATES OF AMERICA**

**v.**

**JOHNNY HARRIS,**

**Defendant.**

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**Case No. 1:21-cr-00274 EGS**

**JOINT MOTION TO AMEND TRIAL SCHEDULING ORDER AND MOTIONS  
DEADLINES**

The United States of America and Defendant Johnny Harris, by and through their undersigned counsel, provide this Joint Motion to Amend Trial Scheduling Order and Motions Deadlines and states as follows:

1. Defendant is charged in a four count Information with violating the following statutes: Count One, 18 U.S.C. § 1752(a)(1)(Entering and Remaining in a Restricted Building or Grounds); Count Two, 18 U.S.C. § 1752(a)(2), Disorderly and Disruptive Conduct in a Restricted Building or Grounds), Count Three, 40 U.S.C. § 5104(e)(2)(D) (Disorderly Conduct in a Capitol Building); Count Four, 40 U.S.C. § 5104(e)(2)(G) (Parading, Demonstrating, or Picketing in a Capitol Building).
2. Jury-trial is set in this case for December 13, 2022. The parties anticipate that this trial will be reset for some time in February 2023. The parties have agreed to exclude time under the Speedy Trial Act until the date of the newly set trial date.
3. The current motions deadlines were set contemplating a December 13, 2022 trial date.
4. The Government has new lead-counsel, Will Widman, who is just getting acclimated to the case.

5. The parties agree to now request new motions deadlines based upon the new anticipated trial date, which will allow additional time to prepare for trial.
6. The parties propose the following deadlines:
  - a. All pretrial motions and notices must be filed by October 14, 2022.
  - b. All oppositions must be filed by November 18, 2022;
  - c. All replies, if any, must be filed by December 16, 2022;
  - d. All joint or individual proposed *voir dire*, pretrial statements, and proposed jury instructions are due to be filed by January 27, 2023.
  - e. Set the motions hearing and Pretrial Conference for the week of February 6, 2023.
  - f. The Court set an in-person Final Pre-Trial Conference for one week before trial.
  - g. The Court set jury trial during the weeks of either February 20 or 27, 2023, with the participating anticipating trial to last up to approximately 5 to 6 days with the inclusion of *voir dire*.
7. The parties propose that the Court enlist a jury panel size of 70 to account for the parties respective peremptory challenges, potential challenges for cause, and any issue that may arise related to the Covid pandemic.

Respectfully Submitted,

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