

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE. NO. 21-CR-226-CRC
	:	
	:	
CHRISTOPHER MOYNIHAN,	:	
	:	
Defendant	:	

MOTION TO SET STATUS CONFERENCE AND AMEND PRETRIAL SCHEDULE

The Defendant, by and through his attorney, Assistant Federal Public Defender Ned Smock, respectfully requests a status conference to discuss scheduling of this matter for the following reasons:

1. On March 17, 2021, the defendant was indicted and charged with Obstruction of an Official Proceeding and Aiding and Abetting, in violation of 18 U.S.C. § 1512(c)(2) and 2; Entering and Remaining in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(2); Entering and Remaining on the Floor of Congress, in violation of 40 U.S.C. § 5104(e)(2)(A); Disorderly Conduct in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(G).

2. The defendant has been out on bond since his arrest. He remains compliant with conditions of release.

3. Today the undersigned entered a Notice of Appearance, having taken over

representation of Mr. Moynihan from previous counsel, Sabrina Shroff. The undersigned will need time to review all discovery in this case, meet with Mr. Moynihan to discuss the case, determine any additional investigative steps that must be taken, and determine whether any motions should be filed. It is likely that the defense will file a motion challenging at least one of the charges in the indictment and counsel needs time to research these issues as well.

4. For these reasons, the defense will not be prepared to proceed on the existing schedule, entered while previous counsel was handling the matter. Counsel will of course endeavor to familiarize himself with the case quickly so as to be able to proceed as expeditiously as possible. The defense therefore suggests convening a brief status conference to discuss scheduling in this matter.

Respectfully submitted,

A.J. KRAMER
Federal Public Defender

/s/
Ned Smock
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