

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : CASE NO. 1:22-cr-40
: :
: (JUDGE BOASBERG)
v. : :
: :
SANDRA WEYER, : :
: :
: :
Defendant. : :

MOTION TO CONTINUE STATUS CONFERENCE

AND NOW, this 13th day of November 2022, comes the Defendant Sandra Weyer, by and through her attorney Jonathan W. Crisp, Esquire, and hereby requests this Honorable Court grant her Motion to Continue the Status Conference. In support of said motion, the following is averred:

1. The Defendant was indicted on 2 February 2022, and charged with the following:

- a) Count 1: Obstruction of an Official Proceeding and Aiding and Abetting;¹
- b) Count 2: Entering and Remaining in a Restricted Building or Grounds;²
- c) Count 3: Disorderly and Disruptive Conduct in a Restricted Building or Grounds;³

¹ 18 USC §§ 1512(c)(2), and 2

² 18 USC § 1752(a)(1)

³ 18 USC § 1752(a)(2)

d) Count 4: Disorderly Conduct in a Capitol Building;⁴

e) Count 5: Parading, Demonstrating, or Picketing in a Capitol Building;⁵

2. On 8 February 2022, the Defendant entered a plea of not guilty to the indictment before the Honorable Emmet G. Sullivan, U.S. Senior Judge.
3. The Status Conference is currently scheduled for 17 November 2022 at 3:30 p.m.
4. On 26 September 2022, trial in the case of United States v. Elmer Stewart Rhodes, et. al., docket number 1:22-cr-00015-APM began. The case was set to continue until on or about 28 October 2022. On or about Friday, 21 October 2022, the Honorable Amit Mehta informed the parties trial would continue through the week of 7 November and likely into the week of 14 November 2022.
5. Accordingly, undersigned counsel will not be available for the hearing on the currently scheduled date.
6. Undersigned counsel is unavailable the following dates:
 - a) 21 November Pretrial Conference at 10AM for *US v Bonds* and Presentence Conference at 3PM for *US v Soto Delgado*;

⁴ 40 USC § 5104(e)(2)(D)

⁵ 40 USC § 5104(e)(2)(G)

- b) 22 November Sentencing Hearing at 2:30PM for *US v Fortich*;
- c) 23 PFA Hearing at 8AM for *Villas Rodriguez v LaRosa*;
- d) 28 November-2 December Trial for *US v Bonds*;
- e) 30 December Status Conference at 2:30PM for *US v Lawton*;
- f) 6 December Article 32 Hearing for *US v Jones*;
- g) 7 December Sentencing Hearing at 1PM for *Commonwealth v Metallo*;
- h) 9 December Formal Arraignment at 10AM for *Commonwealth v Isom*;
- i) 12-14 December Flight Evaluation Board at Keesler AFB;
- j) 14 December Summary Appeal Hearing at 1:30PM for *Commonwealth v Mahmoud*;
- k) 15 December Status Conference at 9AM for *US v Nester & Pomeroy*;
- l) 15 December Sentencing Hearing at 1:30PM for *US v Soto Delgado*;
- m) 16 December Violation Hearing at 8:30AM for *US v Lindsay*;
- n) 18-20 December Board of Inquiry Hearing at Maxwell AFB;
- o) 9-13 January GCM Trial for *US v Perry*;
- p) 20 January Pretrial conference for *US v Oakley*;
- q) 23-26 January Trial for *US v Oakley*.

7. Undersigned counsel has received concurrence from Assistant United States Attorney Jennifer Blackwell for instant motion.

8. AUSA Jennifer Blackwell represented that either herself or AUSA Sarah Santiago could be available any date prior to 16 December.
9. Undersigned counsel respectfully requests that this Honorable Court attribute any delay under the Speedy Trial Act to the defense.
10. Under the Speedy Trial Act, delay resulting from any pretrial motion, from the filing of the motion through the conclusion of the hearing, or other prompt disposition of such motion, shall be excluded in computing the time within which trial must be commenced. See 18 U.S.C. § 3161(h)(1)(D).

WHEREFORE, it is respectfully requested that the Court grant the Defendants' Motion to Continue the Status Conference in this case. In accordance with Local Rule LCvR 16.1(b), notice has been given to all other parties in this matter. In accordance with Local Rule LCvR 7(a), no brief is being submitted in support of this motion because it is a motion for continuance initial appearance with the reasons for the motion fully set forth.

Respectfully submitted,
CRISP AND ASSOCIATES, LLC

Date: 13 November 2022

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CERTIFICATE OF CONCURRENCE

I, Jonathan W. Crisp, Counsel for Defendant, Sandra Weyer, hereby certify that Assistant United States Attorney, Jennifer Blackwell, Esquire, has no objections to and concur in the foregoing Motion.

Date: 13 November 2022

/s/ Jonathan W. Crisp
Jonathan W. Crisp, Esquire

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on the individual listed below:

ELECTRONIC SERVICE

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