

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

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

UNOPPOSED MOTION TO POSTPONE PLEA AGREEMENT HEARING

The Defendant, by and through his attorney, Assistant Federal Public Defender Ned Smock, respectfully requests that the July 6, 2022 Plea Agreement Hearing be postponed 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. Mr. Moynihan has decided to plead guilty and a Plea Agreement Hearing is currently scheduled for July 6, 2022 at 2:00 p.m. Mr. Moynihan had planned to travel to Washington, D.C. from New York for the hearing. However, Mr. Moynihan has a history of

controlled substance abuse and he reported that he relapsed and is in need of substance abuse treatment. He was admitted to an inpatient detoxification facility two days ago. Pretrial Services is arranging for him to enter a longer-term inpatient facility immediately after his completion of the detoxification program.

3. The undersigned has consulted with counsel for the United States. Under the circumstances, the parties agree that postponing the Plea Agreement Hearing would be appropriate. The parties suggest setting a new date for the hearing after August 15, 2022.

4. The parties agree that the Speedy Trial clock should be tolled until the rescheduled Plea Agreement Hearing date.

Respectfully submitted,

A.J. KRAMER
Federal Public Defender

/s/
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