

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	Criminal No. 21-cr-00374-APM-1
)	
v.)	
)	
LOGAN GROVER,)	
)	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE MOTIONS

Logan Grover, by and through counsel Megan M. Downing of Recht Kornfeld P.C., respectfully moves the Court for an extension of time in which to file motions. As grounds, he states:

The United States has charged Mr. Grover by Complaint in this matter with four offenses related to the events occurring at the United States Capitol January 6, 2021 which are the following:

1. 18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds without Lawful Authority,
2. 18 U.S.C. § 1752(a)(2) – Disorderly and Disruptive Conduct in a Restricted Building,
3. 40 U.S.C. § 5104(e)(2)(D) – Violent Entry and Disorderly Conduct on Capitol Grounds, and
4. 40 U.S.C. § 5104(e)(2)(G) – Parading, Demonstrating, or Picketing in a Capitol Building. (*See* ECF No.1).

According to the Court’s Amended Pretrial Order (ECF No. 37)., trial commences on June 10, 2022 and counsel must file any motions under Rule 12 of the Federal Rules of Criminal Procedure by March 23, 2022. The Court scheduled a motions hearing for April 8, 2022.

On Friday, March 18, 2022, counsel for the Defense engaged in a telephone conference with the Government. The purpose of the call was to confer about certain items of discovery. In addition, the parties discussed the general status of the case and motions that the Defense intended to file. Defense counsel sought to confer in good faith with opposing counsel about motions to narrow issues to be raised with the Court.

During this call, the Government alerted the Defense that additional discovery has been identified as the result of the Government's ongoing review to ensure that all evidence it may seek to admit against Mr. Grover has been produced. The Government mailed this material to the Defense via FedEx. The Government further alerted the Defense that the forthcoming discovery includes specific information related to Mr. Grover and his alleged conduct inside the United States Capitol. The parties agreed that this information may affect a specific motion the Defense intends to file. For this reason, the Government does not object to the request for an extension to give the Defense an opportunity to review the new discovery in advance of filing motions.

While the Defense does not seek to delay the case, the Defense must review all evidence related directly to Mr. Grover to file effective and appropriate motions with the Court and in accordance with the Sixth Amendment. As of the time of filing of this Motion, the Defense has not yet received the awaited discovery. As the Defense understands, the Government mailed the latest discovery during the week of March 14, 2022. For the above-explained reasons, the Defense respectfully requests an extension of 14 days to receive and review the new discovery material before filing motions. The Defense understands that the granting of this request may affect the currently scheduled motions hearing of April 8, 2022, and would not object to a continuance of the hearing if requested by the Government to allow adequate time for responsive pleadings.

Dated: March 21, 2022

Respectfully submitted,

s/ Megan M. Downing
Megan M. Downing (*via pro hac vice*)
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Counsel for Logan Grover

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March, 2022, I electronically filed the foregoing **Unopposed Motion for Extension of Time to File Motions** with the Clerk of Court using the CM/ECF system which will send notification of such filing to all listed parties.

s/ Erin Holweger