

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE NO. 1:21-CR-00513 RBW
	:	
WILLIAM WATSON	:	
	:	
Defendant.	:	

UNITED STATES' UNOPPOSED MOTION TO ADJOURN PRETRIAL DEADLINES

The United States hereby moves this Court for an adjournment of the current deadlines to file their respective pretrial motions, notices, and filings, and in support of its motion states:

1. Trial of this matter is set for November 14, 2022. July 25, 2022, Minute Entry.
2. In preparation for trial, this Court entered a Pretrial Scheduling Order. ECF No. 34. Pursuant to the order, motions in limine and Rule 404(b) notices and/or evidence of prior convictions for impeachment purposes were due on September 12, 2022. *Id.* Responses to motions in limine and objections to Rule 404(b) notices and/or evidence of prior crimes were due on September 26, 2022. *Id.* Finally, joint proposed voir dire questions, jury instructions, and verdict forms were also due on or before September 26, 2022. *Id.*
3. On September 12, 2022, the Government filed an unopposed motion to continue the pretrial deadlines as the parties engaged in plea negotiations and the potential for a case resolution short of a trial on the merits. ECF No. 36. The Court granted the motion on September 13, 2022. ECF No. 37.
4. On September 20, 2022, Defendant filed a motion to dismiss Count 1 of the current indictment charging one violation of 18 U.S.C. § 1512(c)(2) and 2. ECF No. 38.

5. The United States will timely respond to the motion on or before October 4, 2022.

6. Given the current procedural posture of the case, the parties have conferred about the resolution of this case matter and have reached the following agreements related to the current case status:

a. Should this Court GRANT Defendant's motion, it is highly likely, as the Government has done in the other January 6 cases where the charge of 18 U.S.C. § 1512(c)(2) has been dismissed, that the Government will seek to appeal the Court's order of dismissal.

b. Should this Court DENY Defendant's motion, Defendant wishes to move forward with an agreed stipulated trial as to Counts 1 and 3. In so doing, the Government will agree to dismiss the remaining counts of the current indictment.

c. With these alternatives, a jury trial on November 14, 2022 will not be necessary, though a setting for a stipulated trial setting, that would likely last an hour or less, will potentially be required.

7. As such, the Government requests that the pretrial deadlines currently set by this Court's order of September 13, 2022 (ECF No. 37) be adjourned.

8. Counsel for the Defendant Watson has been contacted and they do not oppose the relief requested in this motion.

WHEREFORE, the United States respectfully requests that this Court adjourn the current pretrial deadlines as requested for the reasons set forth above.

Respectfully submitted,

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