UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Case No.: 1:21-cr-00503-RCL-1

V.

MOTION TO CONTINUE STATUS HEARING AND FOR IN PERSON HEARING

GLENN ALLEN BROOKS

Defendant.

COMES NOW, Glenn Allen Brooks, through counsel, Joseph R. Conte, to respectfully request this honorable court to continue the status hearing currently set for February 4, 2022, until a mutually agreeable future date. As grounds for this motion counsel would state:

- 1. On January 26, 2022, the court granted the government's motion for a status hearing and *sue sponte* scheduled the status hearing for February 4, 2022.
- Undersigned counsel will be out of the jurisdiction on February 4, 3022.
- 3. Undersigned counsel and counsel for the government are available the following week as follows:

February 8, 2022, morning only

February 9, 2022, between 11:00 a.m. and 3:00 p.m.

February 10, 2022, all day

United States v. Glenn Allen Brooks Case #1:21-cr-00503-RCL-1 Motion to Continue Status Hearing and for In Person Hearing Page No. 1 Joseph R. Conte 400 Seventh St., N.W., #206 Washington, D.C. 20004 Phone: 202.638.4100 Email: dcgunlaw@gmail.com

CONTINUE 22/01/27 14:33:06

February 11, 2022, after 11:00 a.m. except 2:00 to 3:00 p.m.

4. The defendant has advised undersigned counsel that he will not waive his right to be present at the hearing.

WHEREFORE counsel respectfully requests that this motion be granted.

Dated: January 27, 2022

Respectfully submitted,

Joseph R. Conte, Bar #366827 Counsel for Glenn Allen Brooks Law Office of J.R. Conte 400 Seventh St., N.W., #206 Washington, D.C. 20004

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United States v. Glenn Allen Brooks Case #1:21-cr-00503-RCL-1 Motion to Continue Status Hearing and for In Person Hearing

Page No. 2

CONTINUE 22/01/27 14:33:06

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