

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-346 (BAH)
	:	
GLEN MITCHELL SIMON,	:	
	:	
Defendant.	:	

UNITED STATES' UNOPPOSED MOTION TO CONTINUE SENTENCING

The United States of America hereby moves this Court for a 24-day continuance of the sentencing scheduled for January 21, 2022. In support of its motion, the government states as follows:

Defendant is charged via information with violations of 18 U.S.C. §§ 1752(a)(1) (Entering and Remaining in a Restricted Building) and (a)(2) (Disorderly and Disruptive Conduct in a Restricted Building) and 40 U.S.C. §§ 5104(e)(2)(D) (Disorderly Conduct in a Capitol Building) and (G) (Parading, Demonstrating, or Picketing in a Capitol Building). These charges arise from the defendant's conduct on January 6, 2021, when he is alleged to have participated as part of a collective mob in the attack on the U.S. Capitol by entering the U.S. Capitol building and remaining for at least 42 minutes.

On October 15, 2021, in accordance with a plea agreement signed August 6, 2021, the defendant pled guilty to 40 U.S.C. § 5104(e)(2)(G). The Court scheduled the defendant's sentencing for January 21, 2022.

This week, the government discovered additional evidence, warranting further investigation and discussion. The government shared the new evidence with defense counsel. To provide time to review the new evidence and determine if additional steps are warranted, the government requests a 24-day continuance of the sentencing to February 14, 2022. A 24-day

continuance of the sentencing will allow both parties additional time to review the new evidence, will allow the government time to determine whether additional steps are warranted, and will conserve judicial resources. Defense counsel consents to this motion.

WHEREFORE, the government respectfully requests that this Court grant the motion for a 24-day continuance of the sentencing scheduled for January 21, 2022.

Respectfully submitted,

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By:



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