

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

**UNITED STATES OF AMERICA** )  
 )  
 v. ) **CR. NO. 1:22-cr-92-DLF-1**  
 )  
**BRIAN GLENN BINGHAM** )

**UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE**

**NOW COMES** the Defendant, **BRIAN GLENN BINGHAM**, through Undersigned Counsel, Sandi Y. Dawson, and moves the Court to continue the status conference presently set for December 6, 2022, for at least sixty (60) days. In support of this motion, Defendant states the following:

1. The Court held a status conference in this matter on September 6, 2022. *See* Dkt: Minute Entry for Status Conference (Sept. 6, 2022).
2. At the September 6, 2022 status conference, undersigned counsel explained “the need for the defense to participate in a tour of the Capitol and to determine how best to defend this case.” Dkt: Minute Order. (Sept. 6, 2022). At that time, no Capitol tours were scheduled by the government. Accordingly, the Court set another status hearing for December 6, 2022, and excluded time until that date in computing the date for a speedy trial in this case. *Id.*
3. To date, no Capitol tour has been scheduled by the government.
4. Mr. Bingham, therefore, requests the status conference presently set for December 6, 2022, be continued for at least 60 days to permit counsel to attend a Capitol tour to determine available defenses to the charges against him and how best to resolve this case.
5. Mr. Bingham has conferred with undersigned counsel regarding his right to a speedy trial.

Mr. Bingham expressly waives his right to a speedy trial from December 6, 2022, until such date that the Court can reschedule his status conference.

6. The government, through Assistant United States Attorney Christopher Amore, does not oppose this motion.

Wherefore, Mr. Bingham respectfully requests the status conference presently set for December 6, 2022, be continued at least sixty (60) days and that time until the rescheduled status conference be excluded in computing the time for speedy trial in this case.

Dated this 22nd day of November 2022.

Respectfully submitted,

**s/ Sandi Y. Dawson**

**SANDI Y. DAWSON**

Bar No.: CA292946

Federal Defenders

Middle District of Alabama

817 South Court Street

Montgomery, AL 36104

TEL: (334) 834-2099

FAX: (334) 834-0353

E-Mail: Sandi\_Dawson@fd.org

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Respectfully submitted,

**s/ Sandi Y. Dawson**  
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**SANDI Y. DAWSON**  
Bar No.: CA292946  
Federal Defenders  
Middle District of Alabama  
817 South Court Street  
Montgomery, AL 36104  
TEL: (334) 834-2099  
FAX: (334) 834-0353  
E-Mail: Sandi\_Dawson@fd.org