

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

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	<b>CR. NO. 1:22-cr-92-DLF-1</b>
	)	
<b>BRIAN GLENN BINGHAM</b>	)	

**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 February 27, 2023, 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. On November 22, 2022, Mr. Bingham filed an unopposed motion to continue the status conference for an additional sixty (60) days because no Capitol tours had been scheduled from September 6, 2022 to November 22, 2022. ECF No. 41. The Court granted that motion and rescheduled the status conference to February 27, 2023. Dkt: Minute Order. (Nov. 28, 2022).

4. To date, no Capitol tour has been scheduled by the government. The government has indicated that tours will be scheduled for an undetermined date.
5. Mr. Bingham, therefore, requests the status conference presently set for February 27, 2023, be continued for sixty (60) days to permit counsel to attend a Capitol tour to determine available defenses and how best to resolve this case.
6. 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 February 27, 2023, until such date that the Court can reschedule his status conference. Mr. Bingham is filing concurrent with this motion a notice regarding waiver of speedy trial.
7. 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 February 27, 2023, be continued 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 February 2023.

Respectfully submitted,

**s/ Sandi Y. Dawson**

**SANDI Y. DAWSON**

Bar No.: CA292946

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 22, 2023, 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**

**SANDI Y. DAWSON**

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