

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-274 (RDM)
	:	
JOHNNY HARRIS,	:	
	:	
Defendant.	:	

**JOINT MOTION TO CONVERT THE FEBRUARY 22, 2023 PRETRIAL
CONFERENCE HEARING TO A CHANGE OF PLEA HEARING
AND VACATE THE FEBRUARY 27, 2023 TRIAL**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and defendant Johnny Harris, by and through his attorney, Samuel J. Randall, IV, respectively, now submit this Joint Motion to Convert the February 22, 2023 Pretrial Conference to a Change of Plea Hearing and Vacate the February 27, 2023 Trial.

On December 21, 2022, considering the defendant's waiver of a jury trial, the Court scheduled a bench trial to begin on February 27, 2023. *See* Minute Order, December 21, 2022. The Court further issued a pretrial scheduling order, which included a pretrial conference on February 22, 2023, at 11:00 a.m. *See id.*

On February 10, 2023, the defendant through counsel expressed interest in receiving a new plea offer from the government and waiving his right to a trial altogether. On February 14, 2023, defense counsel provided the government with a signed plea letter and statement of offense, wherein the defendant agrees to plead guilty to Count Two of the Information, charging Disorderly and Disruptive Conduct in a Restricted Building, in violation of 18 U.S.C. § 1752(a)(2).

In light of the defendant entering into a plea agreement with the government, the parties request that the pretrial conference scheduled for February 22, 2023, at 11:00 a.m., be converted to an in-person change of plea hearing and the trial date of February 27, 2023, vacated.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Will N. Widman
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Certificate of Service

I hereby certify that on February 15, 2023, I caused a copy of the foregoing memorandum to be served on counsel of record via electronic filing.

/s/ Will N. Widman

WILL N. WIDMAN

Trial Attorney, Detailee