

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

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<b>UNITED STATES</b>	)	
	)	
	)	
<b>v.</b>	)	<b>Crim. No. 1:21-cr-206-RDM</b>
	)	
<b>JONATHAN MELLIS</b>	)	
	)	
<b>Defendant.</b>	)	
_____	)	

**JOINT MOTION TO CONTINUE CHANGE OF PLEA HEARING**

Defendant Jonathan Mellis, by and through undersigned counsel, and the United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully move this Court to continue his change of plea hearing, currently scheduled for June 5, 2023, until June 12, 2023 at 9:00 AM.

In support of this motion, counsel state the following:

1. Mr. Mellis is before this Court charged by Superseding Indictment with: 1) Civil Disorder, in violation of 18 U.S.C. § 231(a)(3); 2) Obstruction of an Official Proceeding, in violation of 18 U.S.C. §§ 1512(c)(2) and 2; 3) Assaulting, Resisting, or Impeding Certain Officers Using a Dangerous Weapon, in violation of 18 U.S.C. §§ 111(a)(1) and (b); 4) Entering and Remaining in a Restricted Building or Grounds with a Deadly or Dangerous Weapon, in violation of 18 U.S.C. §§ 1752(a)(1) and (b)(1)(A); 5) Disorderly and Disruptive Conduct in a Restricted Building or Grounds with a Deadly or Dangerous Weapon, in violation of 18 U.S.C. §§ 1752(a)(2) and (b)(1)(A); 6) Impeding Ingress and Egress in a Restricted Building or Grounds with a Deadly or Dangerous Weapon, in violation of 18 U.S.C. §§ 1752(a)(3) and (b)(1)(A); 7) Engaging in Physical Violence in a Restricted Building or Grounds with a Deadly or Dangerous

Weapon, in violation of 18 U.S.C. §§ 1752(a)(4) and (b)(1)(A); 8) Disorderly Conduct in a Capitol Building, in violation of 40 U.S.C § 5104(e)(2)(D); 9) Impeding Passage Through the Capitol Grounds or Buildings, in violation of 40 U.S.C. § 5104(e)(2)(E); and 10) Act of Physical Violence in the Capitol Grounds or Buildings, in violation of 40 U.S.C. § 5104(e)(2)(F).

2. The parties have finalized and executed the change of plea agreements but were unfortunately not able to provide them to the Court until June 3.

3. As such, counsel request a continuance of Mr. Mellis' change of plea hearing for a short period of time.

**WHEREFORE**, for the foregoing reasons, the parties jointly request that the Court continue the change of plea hearing, currently scheduled for June 5, 2023, until June 12, 2023 at 9:00 AM.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
David Benowitz  
DC Bar # 451557  
*Counsel for Jonathan Mellis*  
Price Benowitz LLP  
409 7<sup>th</sup> Street, NW, Suite # 200  
Washington, DC 20004  
Phone: (202) 271-5249  
Fax: (202) 664-1331  
David@pricebenowitz.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6<sup>th</sup> day of June 2023, a true copy of the foregoing Joint Motion to Continue was served via the CM/ECF system upon all relevant parties.

\_\_\_\_\_/s/\_\_\_\_\_  
David B. Benowitz