

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

UNITED STATES OF AMERICA :

:

v. :

:

KEVIN JAMES LYONS, :

Defendant. :

Criminal No.: 21-CR-79-BAH

MOTION TO CONTINUE

Now comes the Defendant, Kevin Lyons, by his attorney, Lawrence Wolf Levin, and moves this court to grant a 30-day continuance in the above—captioned matter. In support thereof, Defendant states as follows:

1. That defendant, Kevin Lyons, is charged with particular crimes against the United States, with particularity as to Obstruction of an Official Proceeding, and Aiding and Abetting in violation of 18 U.S.C. §1512(c)(2), by Indictment with violations of 18 U.S.C. § 1752(a) and 40 U.S.C. § 5104(e)(2)(C) and (D), related to crimes that occurred at the United States Capitol on January 6, 2021.
2. That Counsel had previously requested certain information to and including an inspection of the Speaker’s Office and Chambers where some of the alleged allegations are to have taken place.
3. In addition, there remains about 8 terabytes of information previously requested from the Government, which today remains unfulfilled.
4. It is imperative that Counsel has this information so as to properly counsel “Defendant, Kevin Lyons,” relative to trial or a plea in the instant matter.

5. That this request is not being made to delay the ends of justice, but to help Mr. Lyons make an informed decision based on “the potential evidence against him.”
6. That Defendant would waive The Speedy Trial Act, and would have no objection to the exclusion of time.

WHEREFORE, Defendant, Kevin Lyons, through counsel, moves this Court to for a continuance in this matter of approximately 30 days to afford production of certain discovery and for further preparation.

Respectfully submitted,

/s/Lawrence Wolf Levin
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