

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-cr-00374-APM-1
v.	:	
	:	
LOGAN GROVER,	:	
	:	
Defendant.	:	

**UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE MOTIONS IN
LIMINE REGARDING CROSS-EXAMINATION OF LAW ENFORCEMENT
WITNESSES**

The United States, without objection from Defendant Logan Grover (“Grover”), moves the Court for an order extending time to file motions in limine regarding the cross-examination of law enforcement witnesses until May 25, 2022. The United States’ requests an extension of time to file motions in limine regarding the cross-examination of law enforcement witnesses only as to potential *Giglio v. United States*, 405 U.S. 150 (1972), information related to law enforcement witnesses. In support of the motion, the United States shows unto the Court:

RELEVANT BACKGROUND

On January 6, 2021, a Joint Session of the United States House of Representatives and the United States Senate convened to certify the vote of the Electoral College of the 2020 U.S. Presidential Election. While the certification process was proceeding, a large crowd gathered outside the United States Capitol, entered the restricted grounds, and forced entry into the Capitol building. As a result, the Joint Session and the entire official proceeding of the Congress was halted until law enforcement was able to clear the Capitol of hundreds of unlawful occupants and ensure the safety of elected officials.

Based on closed-circuit video footage and other information gathered during the investigation, at approximately 2:46 p.m. Grover first entered restricted grounds surrounding the Capitol. At 3:15 p.m., Grover was on the East side of the Capitol near the outer Eastern Doors of the Rotunda. Grover then entered the Capitol. Approximately three minutes later, Grover was in the Rotunda where he remained until approximately 3:20 p.m. and during which time a physical altercation between rioters and officers occurred. Grover left the Rotunda but remained inside the Capitol Building. Video footage from an officer's body-worn-camera time stamped at 3:27 p.m. depicted Grover looking at his cellular phone as law enforcement officers removed Grover and other protesters from the Capitol building. ECF No. 1-1 at 5. At 3:32 p.m., Grover exited the Capitol through the East Rotunda doors.

On April 26, 2021, the United States filed a criminal complaint that charged Grover with Knowingly Entering or Remaining in a Restricted Building or Grounds without Lawful Authority, in violation of 18 U.S.C. § 1752 (a)(1); Disorderly and Disruptive Conduct in a Restricted Building, in violation of 18 U.S.C. § 1752 (a)(2); Violent Entry and Disorderly Conduct on Capitol Grounds, in violation of 40 U.S.C. § 5104 (e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of 40 U.S.C. § 5104 (e)(2)(G). ECF No. 1. On April 28, 2021, law enforcement agents arrested Grover on the charges contained in the Criminal Complaint. ECF No. 5.

On May 4, 2021, the United States filed a 4-count Information that charged Grover with Entering and Remaining in a Restricted Building, in violation of 18 U.S.C. § 1752(a)(1)(Count 1); Disorderly and Disruptive Conduct in a Restricted Building, in violation of 18 U.S.C. § 1752(a)(2)(Count 2); Violent Entry and Disorderly Conduct in a Capitol Building, in violation of

40 U.S.C. § 5104(e)(2)(D)(Count 3); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of 40 U.S.C. 5104(e)(2)(G)(Count 4). ECF No. 7.

On March 18, 2022, the Court issued an amended pretrial order which, among other matters, directed the parties to file motions in limine on or before May 11, 2022. ECF No. 37.

BASIS FOR MOTION

The Court has established a deadline of May 23, 2022 for the United States to produce grand jury information, Jencks Act information, and any information discoverable pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963), that has not already been disclosed. ECF No. 37 at 1. That would include disclosures under *Giglio v. United States*, 405 U.S. 150 (1972). The United States has begun to interview law enforcement witnesses and, for each, to assess the need for disclosures. But a thorough review of the documentation is necessary to determine whether, and to what extent, motions in limine are necessary to address *Giglio* information. Undersigned counsel has conferred with counsel for Grover. Grover does not object to the motion.

CONCLUSION

For the foregoing reason, the Court should grant the United States' motion for an extension

of time from May 11, 2022, until May 25, 2022, to file motions in limine regarding *Giglio v. United States*, 405 U.S. 150 (1972), information of potential law enforcement witnesses.

Respectfully submitted,

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CERTIFICATION

This is to certify that on this 10th day of May 2022, undersigned counsel served a copy of the foregoing Motion for an Extension of Time to File Motions in Limine on Defendant via the Court's CM/ECF addressed to Defendant's counsels of record.

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