

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	Criminal No. 21-cr-00374-APM-1
)	
v.)	
)	
LOGAN GROVER,)	
)	

CONSENT MOTION TO CONTINUE TRIAL AND TO SET STATUS CONFERENCE

Logan Grover, by and through counsel Megan M. Downing of Recht Kornfeld P.C., with the consent of the Government, respectfully moves the Court to continue the trial scheduled in this matter to commence June 10, 2022, to a term of court in mid-September 2022 stating:

The Court scheduled a trial in this matter for June 10, 2022. The Court scheduled a Pre-Trial Conference for Tuesday, May 31 at 3:00 p.m. The Court ordered the parties to file a joint pre-trial statement, any proposed modifications to standard jury instructions, non-standard jury instructions, and verdict forms by May 18, 2022.

The briefing in this case continues. On May 16, 2022, the Defense received a superseding information filed by the Government on May 13, 2022 charging the same four misdemeanor counts. ECF No. 54. The parties must file responses to motions *in limine* by May 18, 2022. The Court granted the Government an extension until May 25, 2022 to file Motions *in Limine* Regarding Cross-Examination of Law Enforcement Witnesses. ECF No. 53. The Defense anticipates filing a response to this pleading. The Defense previously sought extensions for motions filing. As a result, the due dates for the filing of motions and responses have been extended by request of the parties until very close to the scheduled trial date and has delayed preparation for trial.

Given the remaining briefing to complete, the Defense conferred with the Government regarding the need for a continuance of trial. A continuance is necessary for the Defense to focus on trial preparation once the briefing is completed and to do so once the Court has ruled on the various issues raised by motion. The Government consents to the motion. The Government advises the Defense that it will be providing additional case-specific discovery which includes additional FBI reports, House and Senate video footage, additional Metropolitan Police Department body-worn camera footage, FBI reports, and official timestamped CCTV footage. The video footage has been disclosed previously in the government's global discovery productions, but the Defense will additionally need to review the case-specific discovery and timestamped evidence specifically. The Government also advises that new body worn camera footage may be discovered.

Given the remaining briefing and the anticipated receipt of additional and new discovery, the Defense will not be prepared for trial June 10, 2022. The parties jointly move to continue trial to a term of court in mid-September 2022.

Mr. Grover is prepared to waive his right to a speedy trial under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in that the ends of justice in granting the continuance outweighs the public and Mr. Grover's interests served by a speedy trial, to accommodate a continuance. 18 U.S.C. § 3161(h)(7)(A).

Mr. Grover further moves the Court to set a status conference in advance of the Pre-Trial Conference May 31, 2022 to clarify the briefing schedule, (to include a continuance of the May 18, 2022 filing deadline and to potentially grant leave for filing additional motions based upon new discovery), status of the motions and to set a date for a possible motions hearing, and to reset dates accordingly should the Court grant this motion.

Respectfully submitted this 17th day of May, 2022.

s/ Megan M. Downing
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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of May, 2022, I electronically filed the foregoing Consent Motion to Continue Trial and to Set Status Conference with the Clerk of Court using the CM/ECF system which will send notification of such filing to all listed parties.

s/ Erin Holweger