

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

**UNITED STATES OF AMERICA**

**vs.**

**JEREMY DANIEL GROSECLOSE**  
**Defendant**

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**Case No. 1:21-cr-00311-CRC-1**

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**MOTION TO VACATE TRIAL  
AND SET A NEW TRIAL DATE**

Jeremy Groseclose, by his undersigned counsel, hereby respectfully moves this Honorable Court to vacate the trial date currently scheduled to commence on June 5, 2023 to November 13, 2023 and modify the pretrial motions deadlines.

1. This matter arises out of the events that took place at the United States Capitol on January 6, 2021.
2. Mr. Groseclose has been on pretrial release since he appeared in this district on March 2, 2021. Since that time he has complied with the conditions of pretrial release.
3. He resides in the Western District of Virginia, with his wife and children.
4. He is not charged with any crimes of violence.
5. Trial in the instant case is currently scheduled for June 5, 2023. While the parties have discussed the possibility of a non-trial disposition, no agreement has been reached.
6. Despite due diligence, undersigned counsel is unable to be prepared for trial on the scheduled date as a result of having just completed a multi-defendant trial involving complex issues, which lasted from December 19, 2022 through verdict, which was returned on May 4, 2023.

7. In addition, counsel recently discovered that an FBI confidential human source was involved in connection with a key incident related to Mr. Groseclose's charges. This development requires additional investigation.

8. After consultation with government counsel to take into account their trial scheduled, it appears that the first available date when all counsel will be available for trial will be November 13, 2023.<sup>1</sup>

9. Mr. Groseclose consents to another continuance in this case to maintain continuity of counsel and to allow for necessary additional investigation and preparation for trial. He consents to the tolling of speedy trial to allow his counsel to prepare adequately for trial.

WHEREFORE, Mr. Groseclose respectfully moves this Honorable Court to continue the trial to November 13, 2023 or thereafter and set a corresponding pretrial schedule.

Respectfully submitted,

*/s/ Carmen D. Hernandez* \_\_\_\_\_

**Carmen D. Hernandez**

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<sup>1</sup> Undersigned counsel is scheduled to begin a 4-defendant, multi-count trial involving persons alleged to be members of the Oath Keepers on July 9, 2023, with complex issues which is scheduled to last into late August or early September 2023. Counsel for the government have trials scheduled in October 2023.

**CERTIFICATE OF SERVICE**

I hereby certify that the instant Motion was served on all counsel of record 10<sup>th</sup> day of May, 2023 on all counsel of record via ECF.

*/s/ Carmen D. Hernandez* \_\_\_\_\_

**Carmen D. Hernandez**