

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

United States	)	
	)	
v.	)	NO. 1:21cr140
	)	
Larry Brock	)	
	)	
	)	
<u>Defendant.</u>	)	

**MOTION TO CONTINUE TRIAL DATE**

Comes now the Accused, Larry Brock and moves to continue the current trial date.

Mr. Brock submits as follows:

1. Mr. Brock has been on supervised release since January 2021. He has done well on supervised release and this Court has stepped down his conditions several times.
2. The current trial date is November 14. This Court has ruled on all pretrial motions.
3. Mr. Brock's single felony charge is Obstruction of an Official Proceeding under 18 U.S.C. § 1512(c). Mr. Brock is not accused of property damage or violence but was nonetheless given a felony count because reporter footage shows him behaving peacefully in the Senate chamber. This charge is the largest obstacle to resolution of the case.
4. Mr. Brock moved to dismiss this charge and the Court denied the motion. Mr. Brock respects the Court's decision but, as the Court is aware, the matter is currently before the Court of Appeals on interlocutory appeal from the

government in a related case. *United States v. Garret Miller*, 22-3041.

5. The briefing in the matter is almost complete. Ex. 1. – Briefing Order (Reply due September 28). Given the large number of cases that will be affected by this decision, it seems like the Court of Appeals will not be long in deciding the case. A continuance of but a few months may be sufficient to determine whether a trial on the Obstruction count against Mr. Brock is necessary.
6. Mr. Brock is willing to waive speedy trial for such a continuance.
7. Mr. Brock has discussed this request with the government and it is considering its position.

For the foregoing reasons, Mr. Brock respectfully requests that this Court continue the current trial date until a future date convenient for the Court and the parties.

Respectfully Submitted,

By:

*/s/ Charles Burnham*  
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**CERTIFICATE OF SERVICE**

I have served this filing on the government through the ecf system.

Respectfully Submitted,

By: /s/ Charles Burnham  
Charles Burnham VSB # 72781

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