

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CASE NO. 21-cr-46 (RDM)</b>
<b>v.</b>	:	
	:	
<b>BRADY KNOWLTON</b>	:	
<b>PATRICK MONTGOMERY,</b>	:	
	:	
<b>Defendants.</b>	:	

**GOVERNMENT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
OPPOSITION TO DEFENDANTS’ SUPPLEMENTAL BRIEF ON DEFENDANTS’  
MOTION TO DISMISS**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully requests a two-week extension of time to file its opposition to defendants’ supplemental brief on defendants’ motion to dismiss. In support thereof, the government states the following:

1. On August 3, 2021, the Court heard argument on Defendants’ Motion to Dismiss. During the hearing, the Court requested additional briefing and ordered the defense to file their supplemental brief by September 3, 2021, and the government to respond by September 17, 2021.
2. On September 3, 2021, defendants filed an unopposed motion for an extension of time to file their supplemental brief. In a Minute Order that same day, the Court granted the defendants’ motion for an extension of time and ordered that the defendants file their brief on or before September 17, 2021, and the government file its brief on or before October 1, 2021.
3. On September 17, 2021, defendants filed Defendants’ Joint Supplemental Brief on Defendants’ Motion to Dismiss.

4. The government has been working diligently to respond to defendants' supplemental brief but is requesting a two-week extension to fully address the brief and to ensure that the government's position remains consistent with its position in other Capitol riot cases.

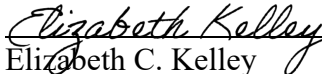
5. The next status hearing is scheduled on October 22, 2021.

6. Government counsel has conferred with counsel for the defendants and the defendants are not opposed to a two-week extension of time for the government to file its opposition.

WHEREFORE, the government respectfully requests this Honorable Court grant a two-week extension of time for the government to file its opposition to Defendants' Joint Supplemental Brief on Defendants' Motion to Dismiss. The government's opposition would be due on October 15, 2021.

Respectfully submitted,

CHANNING D. PHILLIPS  
United States Attorney  
D.C. Bar No. 415793

By:   
Elizabeth C. Kelley  
D.C. Bar No. 1005031  
Assistant United States Attorney  
555 4<sup>th</sup> Street, N.W.  
Washington, D.C. 20530  
(202) 252-7238  
Elizabeth.kelley@usdoj.gov