

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)	
)	
v.)	USDC No. 21-cr-503 (RCL)
)	
Glenn Allen Brooks,)	<i>defendant.</i>

UNOPPOSED MOTION TO CONTINUE STATUS HEARING

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., appointed by this Court under the Criminal Justice Act, respectfully moves the Court, with no opposition from the United States, to continue the in-person status hearing for August 5, 2022 at 12:45 o'clock p.m., for further status and plea hearing, also by VTC, to a date convenient with the Court and the parties on or after October 9, for the reason that follows.¹

1. The defendant is charged in a four-count criminal Information with misdemeanor offenses related to his participation in the Capitol riot of January 6, 2021.

2. Counsel took over this case from other counsel on June 10, 2022. He had an opportunity to consult with the defendant at length when the defendant appeared personally for his status hearing that day. Counsel recently consulted with the defendant about the case and possible defenses. Counsel's own responsibilities with other cases and the defendant's travel out of the country since the status hearing on June 10 prevented him from doing so earlier. Counsel needs to review and share with the defendant case-specific pretrial discovery materials, and then discuss them with his client. Once these tasks have been completed the defendant will be able to advise the Court whether he seeks a trial or intends to resolve the case through a plea agreement.

¹ The defendant has tentative travel plans, again out of the country, with a return on October 8, 2022. October 9 would be slightly more than sixty days from the current status date of August 5. The defendant will file a separate motion for permission to travel.

Counsel needs this additional time to ensure that the defendant's decision, whatever it may be, is well-considered.

3. The government does not oppose this request from the defendant.

4. The defendant requests that the Court schedule the hearing as in-person. The government does not oppose this request.

4. In the interests of justice, the defendants and the United States waive the intervening period between August 5, 2022 and the next court date under the Speedy Trial Act.

A proposed Order is attached.

WHEREFORE, the defendant respectfully moves the Court to grant said relief.

This pleading is,

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Joseph Scott McFarlane, Esq., United States Department of Justice (Criminal Division), attorney of record for the government in the instant case, this 20th day of July, 2022.

/s/

Nathan I. Silver, II