

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

§
§
§
§
§
§
§
§
§

v.

Case No. 21-CR-00046-RDM

PATRICK MONTGOMERY and
BRADY KNOWLTON,

Defendants

DEFENDANTS' JOINT RESPONSE TO
GOVERNMENT'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEF
FILED IN ANOTHER CAPITOL BREACH CASE

TO THE HONORABLE RANDOLPH D. MOSS, UNITED STATES DISTRICT
JUDGE FOR THE DISTRICT OF COLUMBIA:

PATRICK MONTGOMERY and BRADY KNOWLTON, the Defendants in the
above styled and numbered cause, by and through their respective, undersigned coun-
sel, submit the following response to the Government's Motion for Leave to File Sup-
plemental Brief Filed in Another Capitol Breach Case filed with this Court on No-
vember 23, 2021. (Doc. No. 72).

In its Motion for Leave, the Government submitted as an attachment its sup-
plemental brief filed in *United States v. Nordean et al*, 21-CR-175-TJK, discussing
similar issues raised by the Defendants here in their Motion to Dismiss Count Ten of
the Indictment and sought leave to file that brief "on the docket in this case." *Id.*

In response to that filing, the Defendants seek leave to file the response filed
by Defendant Ethan Nordean in response to the Government's filing in that case here

and adopt the arguments and authority submitted in Parts I, II, and III of that response to supplement those previously submitted to this Court in support of their Motion to Dismiss Count Ten of the Indictment.

WHEREFORE, PREMISES CONSIDERED, the Defendants respectfully request this Honorable Court grant Defendants leave to submit the attached response filed by Defendant Ethan Nordean in response to the Government's filing in his case here and permit them to adopt the arguments and authority submitted in Parts I, II, and III of that response to supplement those previously submitted to this Court in support of their Motion to Dismiss Count Ten of the Indictment.

Date: November 28, 2021

Respectfully Submitted,

RONALD SULLIVAN LAW, PLLC

by: /s/ Ronald S. Sullivan Jr.

RONALD S. SULLIVAN JR.

D.C.D.C. Bar ID 451518

rsullivan@ronaldsullivanlaw.com

1300 I Street NW

Suite 400 E

Washington, DC 2005

Telephone: (202) 935-4347

Fax: (617) 496-2277

MAYR LAW, P.C.

by: /s/ T. Brent Mayr

T. BRENT MAYR

Texas State Bar Number 24037052

D.C.D.C. Bar ID TX0206

bmayr@mayr-law.com

5300 Memorial Dr., Suite 750

Houston, TX 77007

Telephone: 713-808-9613

Fax: 713-808-9613

WAGNER PLLC

by: /s/ Camille Wagner

CAMILLE WAGNER

DC Bar No. 1695930

law@myattorneywagner.com

1629 K Street NW, Suite 300

Washington, DC 20006

(202) 630-8812

ATTORNEYS FOR THE DEFENDANT,
BRADY KNOWLTON

A.J. KRAMER

FEDERAL PUBLIC DEFENDER

by: /s/ Dani Jahn

DANI JAHN

Assistant Federal Public Defender

625 Indiana Avenue, N.W., Ste 550

Washington, D.C. 20004

(202) 208-750

ATTORNEY FOR THE DEFENDANT,
PATRICK MONTGOMERY

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the Government, Elizabeth Kelley, James Peterson, and James Pearce, on November 28, 2021, via CM/ECF and email.

/s/ T. Brent Mayr
T. BRENT MAYR