

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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

**GOVERNMENT’S MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEF FILED  
IN ANOTHER CAPITOL BREACH CASE**

During the status conference hearing on November 23, 2021, the Court requested the government to file in this case any supplemental briefs it has filed in other Capitol breach cases. On December 3, 2021, the government filed a reply brief in *United States v. Nordean et al*, 21-CR-175 (TJK). The government’s opening supplemental brief and the defendants’ response brief have previously been filed in this case. The government requests leave to file the *Nordean* reply brief on the docket in this case.

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney  
D.C. Bar No. 481052

By:

/s/ James I. Pearce  
James I. Pearce  
Capitol Breach Appellate Coordinator  
United States Attorney's Office  
NC Bar No. 44691  
555 Fourth Street, N.W.  
Washington, DC 20530  
James.Pearce@usdoj.gov  
(202) 532-4991

Elizabeth C. Kelley  
Assistant United States Attorney  
United States Attorney's Office  
D.C. Bar No. 1005031  
555 Fourth Street, N.W.  
Washington, DC 20530  
Elizabeth.Kelley@usdoj.gov  
(202) 252-7238

James D. Peterson  
Trial Attorney  
United States Department of Justice  
VA Bar No. 35373  
1331 F Street N.W.  
6th Floor  
Washington, D.C. 20530  
(202) 353-0796  
James.d.peterson@usdoj.gov

**CERTIFICATION OF SERVICE**

I hereby certify that on December 5, 2021, I caused a copy of the foregoing motion to be served on counsel of record via electronic filing.

/s/ James I. Pearce  
James I. Pearce