

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

UNITED STATES OF AMERICA

V.

ROBERT MORSS

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CRIMINAL NUMBER 21-40

ORDER

AND NOW, this day of , 2021, upon consideration of the Defendant's Motion for a One Week Continuance of the Bail Hearing, it is hereby **ORDERED** that the motion is **GRANTED**.

The bail hearing in this matter shall begin on the day of , 2021.

BY THE COURT:

G. MICHAEL HARVEY
United States Magistrate Court Judge

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

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V.

ROBERT MORSS

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CRIMINAL NUMBER 21-40

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE OF BAIL HEARING

Robert Morss, by and through his attorneys, Elizabeth L. Toplin, Assistant Trial Unit Chief, and Kathleen M. Gaughan, Assistant Federal Defender, Federal Defender Community Defender Office for the Eastern District of Pennsylvania, hereby moves for a one week continuance of the bail hearing. In support of this request, it is stated:

1. On June 10, 2021, United States Magistrate Court Judge Merriweather issued a warrant for the arrest of Robert Morss on violations of 18 U.S.C. § 231(a)(3) (Certain Acts During Civil Disorder); 18 U.S.C. § 111(a)(1) (Assaulting, Resisting or Impeding Certain Officers or Employees); 18 U.S.C. § 2112 (Robbery of Personal Property of the United States); 18 U.S.C. § 1512(c)(2) (Obstruction of official Proceeding); and aiding and abetting.
2. On June 11, 2021, Mr. Morss was arrested outside his residence in Glenshaw, Pennsylvania. He was brought before a Magistrate Judge for the Western District of Pennsylvania for an initial appearance and a removal to the District of Columbia. The defendant waived his right to have a preliminary hearing and a detention hearing in the arresting district.
3. On June 30, 2021, Mr. Morss had his initial appearance in the District of Columbia. He was arraigned on the indicted charges and the government moved for his

detention. The case was continued to July 7, 2021 for a bail hearing before United States Magistrate Court Judge G. Michael Harvey.

4. Defense counsel was recently appointed to this case and needs additional time to prepare for the bail hearing. Several witnesses will be presented on behalf of Mr. Morss, and counsel for the defense needs additional time to coordinate with those witnesses as well.

5. Assistant United States Attorney Melissa Jackson has no objection to this request.

WHEREFORE, for the foregoing reasons, the defense respectfully requests that this motion be granted and the bail hearing be continued for one week.

Respectfully submitted,

/s/ Kathleen M. Gaughan
KATHLEEN M. GAUGHAN
Assistant Federal Defender

/s/ Elizabeth L. Toplin
ELIZABETH L. TOPLIN
Assistant Trial Unit Chief

CERTIFICATE OF SERVICE

We, Elizabeth L. Toplin, Assistant Trial Unit Chief , and Kathleen M. Gaughan, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that we have electronically filed and served a copy of the Defendant's Unopposed Motion for Continuance of Bail Hearing by Electronic Court Filing ("ECF") notification upon Melissa Jackson, United States Attorney's Office, 555 4th St., NW, Washington, DC 20530.

/s/ Kathleen M. Gaughan
KATHLEEN M. GAUGHAN
Assistant Federal Defender

/s/ Elizabeth L. Toplin
ELIZABETH L. TOPLIN
Assistant Trial Unit Chief

DATE: July 6, 2021