

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

UNITED STATES OF AMERICA,

v.

Case No.: 21-cr-78 (RCL)

JOHN SULLIVAN
Defendant

**MOTION FOR EXTENSION OF TIME TO JULY 5, 2023 TO FILE
OPPOSITIONS TO PENDING PRETRIAL MOTIONS**

Defendant, John Sullivan, by and through undersigned counsel, does hereby seek leave to July 5, 2023 to file oppositions to pretrial motions. In support thereof, defendant states as follows:

1. This is a complex, multiple count, multiple party indictment arising from the events of January 6, 2021. The charges against defendant are as follows: Obstruction of an Official Proceeding, 18 U.S.C. Section 1512, and 2; Civil Disorder in violation of U.S.C. Sections 231 (a)(3) and 2; Entering and Remaining in a Restricted Building and Grounds with a Dangerous Weapon in violation of 18 U.S.C. Section 1752(a)(1) and (b)(1)(A);

Disorderly and Disruptive Conduct in a Restricted Building or Ground with a Dangerous Weapon, in violation of 18 U.S.C. Section 1752 (aa)(2) and (b)(1)(A); Unlawful Possession of a Dangerous Weapon on Capitol Grounds or Buildings, in violation of 40 U.S.C. Section 5104 (e)(1)(A)(i); Disorderly Conduct in a Capitol Building, in violation of 40 U.S.C. Section 5104 (e)(2)(D); Parading, Demonstrating, or Picketing in a Capitol Building, in violation of 40 U.S.C. Section 5104(e)(2)(G); False Statements or Representations to an Agency of the United States, in violation of 18 U.S.C. Section 1001(a)(2); and Aiding and Abetting, in violation of 18 U.S.C. Section 2.

2. The case has been extensively litigated and the majority of pretrial motions have been resolved. There remain a few outstanding motions to be resolved.

3. Trial is scheduled to commence on October 25, 2023.

4. Defendant seeks an extension of time to July 5, 2023 to file oppositions to remaining pretrial motions due to a congested trial calendar.

5. Undersigned counsel is scheduled to commence a very complex thirteen count indictment for first degree sexual abuse against a former Metropolitan Police Department officer on June 26, 2023. There was a pending Motion to Continue Trial Dated based upon a Fifth Amendment

privilege asserted by one of the witnesses that the trial court had under advisement. It was thought the trial would be continued. However, the privilege was deemed no longer applicable and the case will commence trial on June 26, 2023.

6. The trial referenced in Paragraph 5 is extremely complex factually and forensically. The trial will include multiple defense experts from different areas of the country. The areas of expertise include DNA analysis and psychology. Final preparations for trial and the actual trial will consume all of counsel's professional time.

7. The oppositions will be completed by July 5, 2023. There is no prejudice that either party will suffer as a result of the extension of time.

8. Defendant relies upon the supervisory and discretionary powers of this Honorable Court in seeking the relief requested herein.

WHEREFORE, the foregoing considered, defendant prays this Honorable Court for an extension of time to July 5, 2023 to file oppositions to the remaining motions.

Respectfully submitted,

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served, via the Court's electronic filing system, upon all counsel of record on this the __22nd__ day of June, 2023.

_____/s/_____
Steven R. Kiersh

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ORDER

Upon consideration of defendant's Motion for Extension of Time to July 5, 2023 to file opposition to pretrial motions, there being good cause demonstrated, it is by this Court on this the _____ day of _____, 2023:

ORDERED, that the Motion is granted and defendant is granted leave until July 5, 2023 to file oppositions to pretrial motions.

Honorable. Royce C. Lamberth
United States District Judge