

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 1:21-CR-37
	:	
	:	(JUDGE McFADDEN)
v.	:	
	:	
	:	
	:	
TIMOTHY LOUIS HALE-	:	
CUSANELLI,	:	
Defendant	:	

MOTION TO EXTEND TIME TO FILE POST-TRIAL MOTIONS

AND NOW, this 6th day of June 2022, comes the Defendant Timothy Hale-Cusanelli, by and through his attorney Jonathan W. Crisp, Esquire, and hereby requests this Honorable Court grant his Motion to Extend Time to File Post-Trial Motions. In support of said motion, the following is averred:

1. The Defendant was indicted on 29 January 2021, and charged with the following:
 - a) Count 1: Civil Disorder;¹
 - b) Count 2: Aiding and Abetting²
 - c) Count 3: Obstruction of an Official Proceeding;³
 - d) Count 4: Entering and Remaining in a Restricted Building or Grounds;⁴
 - e) Count 5: Impeding Ingress and Egress in a Restricted Building or Grounds;⁵

¹18 USC § 231(a)(3)

²18 USC § 2

³ 18 USC § 1512(c)(2)

⁴ 18 USC § 1752(a)(1)

⁵ 18 USC § 1752(a)(3)

f) Count 6: Disorderly Conduct in a Capitol Building;⁶

g) Count 7: Parading, Demonstrating, or Picketing in a Capitol Building;⁷

2. Defendant was found guilty on all counts on 27 May 2022.
3. On 6 June, 2022 Attorney Nicholas Smith was retained to assist with post-trial motions and sentencing.
4. Attorney Smith received the trial transcripts just prior to contracting COVID-19 and has unable to review while ill.
5. Sentencing is currently scheduled for 16 September 2022.
6. Undersigned counsel is in need of additional time to coordinate with Attorney Smith and prepare motions and notices.
7. Therefore, undersigned counsel respectfully requests a continuance of two (2) weeks to file any post-trial motions. The requested deadline would be 24 June 2022.
8. Assistant United States Attorney Karen Seifert, Esquire concurs with the instant motion.

WHEREFORE, it is respectfully requested that the Court grant the Defendants' Motion to Extend Time to File Post-Trial Motions. In accordance with Local Rule LCvR 16.1(b), notice has been given to all other parties in this matter. In accordance with Local Rule LCvR 7(a), no brief is being submitted in support of this motion

⁶ 40 USC § 5104(e)(2)(D)

⁷ 40 USC § 5104(e)(2)(G)

because it is a motion for continuance of pretrial motions and notices with the reasons for the motion fully set forth.

Respectfully submitted,
CRISP AND ASSOCIATES, LLC

Date: 6 June 2022

/s/Jonathan W. Crisp
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CERTIFICATE OF CONCURRENCE

I, Jonathan W. Crisp, Counsel for Defendant, Timothy Hale-Cusanelli, hereby certify that Assistant United States Attorney Karen Seifert, Esquire, has no objections to the foregoing Motion.

Date: 6 June 2022

/s/ Jonathan W. Crisp
Jonathan W. Crisp, Esquire

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on the individual listed below:

ELECTRONIC SERVICE

Karen Seifert, Esquire
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Date: 6 June 2022

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