

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

**UNITED STATES OF AMERICA** :

:

**v.** :

:

**KEVIN JAMES LYONS,** :

:

**Defendant.** :

**Criminal No.: 21-CR-79-BAH**

**MOTION TO RESET HEARING AND STIPULATED TRIAL DATE**

Now comes the Defendant, Kevin Lyons, by his attorney, Lawrence Wolf Levin, and moves this Honorable Court to reset the stipulated trial date in the instant cause which had been previously set for March 3, 2023. In support thereof, Defendant states as follows:

1. That Defendant, Kevin Lyons, is charged with particular crimes against the United States, with particularity as to Obstruction of an Official Proceeding, and Aiding and Abetting in violation of 18 U.S.C. §1512(c)(2), by Indictment with violations of 18 U.S.C. § 1752(a) and 40 U.S.C. § 5104(e)(2)(C) and (D), related to crimes that occurred at the United States Capitol on January 6, 2021.
2. That Defendant has asked to appear before this Honorable Court relative to a stipulated bench trial.
3. That Counsel for Kevin Lyons recently had extensive back surgery, due to a broken back, on January 4, 2023, and has not been released by his doctors to return to work and/or in the alternative travel.
4. That said request is not being made to delay the ends of justice; however, as a result of the surgery performed on Counsel, he is unable to appear as required.

5. Counsel has spoken to the Assistant United States Attorney, Sean McCauley, and he has no objection to the resetting of the “Stipulated Trial Date.”

WHEREFORE, Defendant, Kevin Lyons, by his lawyer, Lawrence Wolf Levin, moves this Honorable Court to reset the Stipulated Trial Date in the instant cause to a date approximately 30 days from the March 3, 2023 date as previously set.

Respectfully submitted,

/s/Lawrence Wolf Levin  
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