

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	CRIMINAL ACTION NO.
)	
Plaintiff,)	1:21-CR-117(TFH)
)	
v.)	
)	
Alex Kirk Harkrider,)	
)	
Defendant.)	
_____)	

**DEFENDANT HARKRIDER’S UNOPPOSED MOTION TO CONTINUE HEARING ON
MOTION TO SUPPRESS EVIDENCE**

COMES NOW, Defendant, Alex Harkrider, by undersigned counsel, and respectfully moves the Court to continue the hearing on the Motion to Suppress filed by Mr. Harkrider and states the following in support:

1. This case is set for hearing and argument before this Court tomorrow, August 25th, 2022 at 10:30 a.m.
2. The government just disclosed minutes ago the existence of two body worn camera video and audio tapes that were taken at the moment of Mr. Harkrider’s arrest at his home. These video and audio tapes go to the heart of Mr. Harkrider’s motion to suppress his statements. Moreover, the government just yesterday supplemented their response to Mr. Harkrider’s motion to suppress.
3. In a perfect world, undersigned counsel could scramble and watch the videos, then watch them with her client, compare them with the other evidence in the case, then work on cross exam for the two officers involved, all in time for the hearing tomorrow.

But increasingly, undersigned counsel finds that the world is not perfect. At least not the world of criminal defense. Unfortunately, because of other pressing matters in other cases, undersigned counsel cannot possibly do this all in less than 24 hour's time.

4. Undersigned counsel emailed Mr. Brasher, counsel for the United States, who does not oppose this motion.
5. Undersigned counsel will be in a felony trial in Superior Court August 29 & 30, 2022. On August 31, 2022, undersigned counsel has a hearing in a double homicide case in Superior Court at 10:00 am and a hearing before Judge Walton in federal court at 2:00 p.m. on a motion to dismiss the indictment in a multi defendant complicated fraud case. On September 1, 2022, undersigned counsel will be at a jail two hours away from D.C. all day in an under seal case assigned to Judge Moss.

Based on the foregoing, Defendant Harkrider has demonstrated that his counsel cannot possibly be ready for the hearing tomorrow and respectfully asks that a new date and time after September 1, 2022 be ordered by the Court.

Respectfully Submitted,

KIRA ANNE WEST

By: _____/s/
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Certificate of Electronic Service

I hereby certify that on August 24th, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, with consequent service on all parties of record.

/s/ Kira Anne West

Counsel for Defendant Harkrider