IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

:

V. : CRIMINAL NUMBER 21-447-03, 04, 05

:

JOSHUA CHRISTOPHER DOOLIN, MICHAEL STEVEN PERKINS,

OLIVIA MICHELE POLLOCK :

ORDER

AND NOW, this day of , 2023, upon consideration of the Unopposed Joint Defense Motion for Extension of Time to File Motions in Limine, it is hereby ORDERED that the Motion is GRANTED and motions in limine shall be file on or before January 27, 2023.

BY THE COURT:

THE HONORABLE CARL J. NICHOLS United States District Court Judge

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UNOPPOSED JOINT DEFENSE MOTION FOR EXTENSION OF TIME TO FILE MOTIONS IN LIMINE

Joshua Christopher Doolin, Michael Steven Perkins, and Olivia Michele Pollock, by and through their attorneys, respectfully request an extension of time in which to file motions in limine. As grounds, counsel avers as follows:

- 1. On July 1, 2021, a grand jury returned an indictment charging Mr. Doolin, Mr. Perkins, and Ms. Pollock, as well as Jonathan Daniel Pollock¹ and Joseph Daniel Hutchinson, III, with offenses stemming from the events at the Capitol on January 6, 2021. On July 13, 2022, a grand jury returned a superseding indictment charging all five defendants with civil disorder, in violation of 18 U.S.C. § 231(a)(3), as well as other offenses.
- 2. This Court issued a Scheduling Order on September 2, 2022, setting several deadlines for pre-trial matters. Dkt. Entry 151. Pursuant to that Order, pretrial motions, including motions in limine, are due January 13, 2023.
 - 3. Trial is this case is scheduled to begin March 6, 2023.
- 4. On January 10, 2023, the Court granted Defendant Hutchinson's request to represent himself at trial. In a status conference on January 11, 2023, defense counsel for Olivia Pollock and Michael Perkins expressed their concerns for trying this case with Mr.

¹ As of January 13, 2023, the lead defendant, Jonathan Daniel Pollock, has not been apprehended.

Hutchinson, who is proceeding pro se. Additionally, there are outstanding issues regarding Mr. Hutchinson's access to discovery.

- 5. A status conference for Mr. Hutchinson is scheduled for January 18, 2023.
- 6. Defendants Perkins, Doolin, and Olivia Pollock respectfully request a two-week extension of the deadline to file motions in limine considering the outstanding matters involving Defendant Hutchinson.
- 7. Assistant United States Attorney Benet Kearney has informed defense counsel that the government does not oppose the defense request for an extension of time to file motions in limine.

WHEREFORE, the defense respectfully requests the Court extend the time in which the parties may file motions in limine.

Respectfully submitted,

/s/Nancy MacEoin NANCY MacEOIN Assistant Federal Defender 601 Walnut St., Suite 540W Philadelphia, PA 19106, (215) 928-1100 PA Bar 90923

/s/ Allen Howard Orenberg ALLEN HOWARD ORENBERG The Orenberg Law Firm, P.C. 12505 Park Potomac Ave. 6th. Floor Potomac, MD 20854, (301) 984-8005 DC Bar No. 395519

/s/ Elita C. Amato ELITA C. AMATO 2111 Wilson Blvd., 8th Floor Arlington, VA 22201, (703) 522-5900 DC Bar Number 442797 **CERTIFICATE OF SERVICE**

I, Nancy MacEoin, Assistant Federal Defender, Federal Community Defender Office for

the Eastern District of Pennsylvania, hereby certify that I filed the attached Unopposed Joint

Defense Motion for Extension of Time to File Motions in Limine via the Court's Electronic

Filing (ECF) system which sent notification to Benet J. Kearney, Assistant United States

Attorney, One Saint Andrew's Place, New York, New York 10007, via her email address

Benet.Kearney@usdoj.gov.

/s/ Nancy MacEoin
NANCY MacEOIN

Assistant Federal Defender

DATE:

January 13, 2023