

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

UNITED STATES OF AMERICA

v.

RICHARD T. CROSBY, JR.,

Defendant.

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Case No. 21-cr-458 (RJL)

**STATUS REPORT AND UNOPPOSED MOTION TO EXTEND DEADLINE FOR
GOVERNMENT'S MOTION RESPONSE**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully moves the Court to continue the deadline for the government's motion response, currently scheduled for July 14, 2023, to July 19, 2023. In support of the Motion, the undersigned represents:

1. The defendant is before the Court charged in an indictment with: Obstruction of an Official Proceeding and Aiding and Abetting, in violation of Title 18, United States Code, § 1512(c)(2) and 2; Entering and Remaining in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(2); Entering and Remaining on the Floor of Congress, in violation of Title 40, United States Code, § 5104(e)(2)(A); Disorderly Conduct in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(G) (ECF No. 11).
2. On June 23, 2023, the defendant filed a Motion to Dismiss Count One of the Indictment. Dkt. No. 49. The government's response deadline is currently set for July 12, 2023.

3. The undersigned is only assigned to handle cases arising from January 6 on a part-time basis and carries a full caseload in his home district. This caseload has recently included significant motion practice, including a suppression hearing on July 7, which includes additional briefing this week. Additionally, multiple Assistant United States Attorneys in the undersigned's home district have left the office or are out on leave, which has resulted in the re-assignment of a significant number of cases, one of which is a trial beginning August 14, which was reassigned to the undersigned.
4. Therefore, the government respectfully requests the deadline for filing its response to the defendant's Motion to Dismiss Count One be extended to July 19, 2023.
5. Speedy Trial is tolled by the filing of the defendant's motion, pursuant to 18 U.S.C. § 3161(h)(1)(D), and by the Court's June 15, 2023 Minute Order.
6. The defendant is out of custody.
7. The defendant consents to this request.

Respectfully submitted,

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