

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

UNITED STATES OF AMERICA

*

v.

* **Case No. 21-cr-0631-2 (TJK)**

**THERESE BORGERDING,
Defendant**

*

CONSENT MOTION TO CONTINUE STATUS CONFERENCE FOR TWO WEEKS

Defendant Therese Borgerding, by her undersigned counsel hereby respectfully moves this Honorable Court to continue for two-weeks the Status Conference scheduled for March 31, 2023 due to a medical situation involving Ms. Borgerding's family member, who is suffering from an extremely serious medical condition. In addition, as the Court is aware, undersigned counsel has been involved in a long-running complex federal case. AUSA Francesco Valentini consents to this request. AFPD Ned Smock, who represents Co-Defendant Walter J. Messer consents and joins in this request.

1. Ms. Borgerding and Mr. Messer are charged by Information with various misdemeanor offenses arising out of their alleged conduct at the United States Capitol on January 6, 2021. See Information (ECF 15, filed 10/15/21).

2. The Government has produced and continues to produce extensive discovery, including multiple videos and other materials. As a result of the family medical situation and counsel's trial schedule, Ms. Borgerding requires additional time to review the discovery and consider how to proceed in the case

3. Tolling of the Speedy Trial is in the best interests of Ms. Borgerding and Mr. Messer and of the public and furthers the interests of justice.

4. Both defendants are released pretrial and are in compliance with the conditions of release.

WHEREFORE, Ms. Borgerding with the consent of counsel for Mr. Mosser and counsel for the Government respectfully requests that the Court continue the Status Conference scheduled for March 31, 2023 for two weeks.

Respectfully submitted,

/s/ Carmen D. Hernandez

Carmen D. Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the Consent Motion to Continue has been served on all counsel of record this 31st day of March, 2023.

/s/ Carmen D. Hernandez

Carmen D. Hernandez