

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

UNITED STATES OF AMERICA,

v.

TIMOTHY WILLIAMS,

Defendant.

Case No.: 1:22-cr-00265-RC-1

**UNOPPOSED MOTION TO
CONVERT IN-PERSON CHANGE
OF PLEA HEARING TO VIRTUAL
HEARING**

COMES NOW, Timothy Williams, by and through undersigned counsel, to respectfully request this Honorable Court to convert the in-person change of plea hearing, currently scheduled for February 21, 2023, to a virtual hearing. As grounds for this motion counsel would state:

1. The defendant is charged with five misdemeanors. Entering and Remaining in a Restricted Building in violation of 18 U.S.C. §1752(a)(1), Disorderly and Disruptive Conduct in a Restricted Building or Grounds, in violation of 18 U.S.C. §1752(a)(2), Disorderly Conduct at the Grounds and in a Capitol Building, in violation of 40 U.S.C. §5104(e)(2)(D), and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of 40 U.S.C. §5104(e)(2)(G), and Theft of Government Property in violation of 18 U.S.C. §641.

2. A change of plea hearing is scheduled for February 21, 2023, and the defendant intends to enter a plea to Counts One and Five, Entering and Remaining in a Restricted Building in violation of 18 U.S.C. §1752(a)(1) and Theft of Government Property.

2. The court has scheduled the hearing to be in-person.
3. The defendant resides in Colorado.
4. The defendant is without the financial means to pay transportation and related expenses from Colorado to Washington, D.C. and travel will result in a sever strain on the family's finances.

WHEREFORE counsel respectfully requests that this Honorable Court convert the in-person change of plea hearing to a virtual hearing.

Dated: February 7, 2023

Respectfully Submitted,

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