

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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|---------------------------------------|---|--------------------------|
| United States of America |) | |
| |) | |
| v. |) | USDC No. 21-cr-649 (EGS) |
| |) | |
| Michael Dickinson, <i>defendant</i> . |) | |

UNOPPOSED MOTION TO CONTINUE STATUS HEARING

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., appointed by this Court under the Criminal Justice Act, respectfully moves the Court, with no opposition from the United States, to continue the status hearing set for Feb. 15, 2022 at 9:35 a.m. for a period of approximately sixty (60) days, to a date convenient with the Court and the parties, for the reasons that follow.

1. The defendant is charged in a multi-count indictment with three serious felony offenses and four misdemeanor offenses arising from the protests and eventual riot at the U.S. Capitol on January 6, 2021.

2. The parties have maintained close communication during the pendency of this case. The government has provided and continues to provide pretrial discovery materials, consisting with its obligations, including but not limited to video recordings, records from the investigation compiled by the FBI; and materials pertinent to the defendant himself. In addition, the government has provided global discovery, which pertains to all January 6 defendants.

3. The parties have made progress already. The government has provided a general outline of what it would expect for a pretrial resolution of this case. The defendant, through counsel, has discussed that with the government and provided it with an alternative resolution of

the case. It is believed that a continuance of sixty (60) days will allow the parties to reach, or make substantial progress towards, a resolution short of trial. It is for the stated reasons that the parties seek to continue the status hearing in this case.

2. For the record, in the interests of justice, the defendant waives, as does the United States, the time between Feb. 15, 2022, and the next court date the time under the Speedy Trial Act.

A proposed Order is attached.

WHEREFORE, the defendant respectfully moves the Court to grant said relief.

This pleading is,

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Laura E. Hill, Esq., United States Department of Justice-CIV, attorney of record for the government in the instant case, this 11th day of February, 2022.

/s/

Nathan I. Silver, II