

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)
)
 v.) USDC No. 21-cr-649 (EGS)
)
 Michael Dickinson, *defendant.*)

UNOPPOSED MOTION TO CONTINUE STATUS HEARING
FOR FURTHER STATUS AND PLEA 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 by teleconference (VTC) for July 21, 2022 at 2:30 o'clock p.m., for further status and plea hearing, also by VTC, for a period of at least thirty days to a date convenient with the Court and the parties, for the reason that follows.

1. The defendant is charged in a multi-count indictment with both felony and misdemeanor offenses related to his participation in the Capitol riot of January 6, 2021.
2. The government recently extended a plea offer to the defendant. In order to establish the terms of the plea offer, it had to obtain the names of Capitol Hill police officers who contend that the defendant assaulted them during the event. Once the government obtained that information, it was able to extend the offer. Travel plans of undersigned counsel during the preceding week prevented counsel from being able to review the plea agreement and statement of offense with the defendant. Counsel therefore needs additional time, though not a lengthy amount, in which to review the materials with his client. Inasmuch as the only matter of business that the defendant could conduct at the scheduled July 21 status hearing, it will conserve the Court's resources and save the parties time by continuing the matter for a plea hearing.

3. The government does not oppose this request from the defendant.

4. With respect to scheduling, undersigned counsel will **not** be available, owing to pre-existing travel plans or other court appearances, including several in person, until at least August 18, 2022. In addition, counsel is not available, owing to other court appearances, both in person and by VTC, on Aug. 19 from 9-10 a.m.; Aug. 25 from 10-11 a.m.; and Aug. 26 from 2:30-3:30 p.m.¹

5. In the interests of justice, the defendants and the United States waive the intervening period between July 21, 2022 and the next court date 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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¹ Counsel has a trial tentatively scheduled to begin Aug. 23 before Judge Colleen Kollar-Kotelly and last perhaps up to three days. However, a plea hearing has been scheduled in that case for tomorrow, July 19 at 1:00 p.m.. Should Judge Kotelly accept the plea, the trial will be canceled.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Barry K. Disney,, Esq., United States Department of Justice (CRM), attorney of record for the government in the instant case, this 18th day of July, 2022.

/s/

Nathan I. Silver, II