

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

UNITED STATES OF AMERICA

V.

CHRISTIAN M. MANLEY

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CRIMINAL NUMBER 21-691

**DEFENDANT’S UNOPPOSED MOTION
FOR THIRTY (30) DAY CONTINUANCE OF TRIAL**

Christian M. Manley, by and through his attorney, Natasha Taylor-Smith, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania respectfully requests that the Court continue his trial in the above captioned case. In support of this request, it is stated:

1. On November 19, 2021, Christian Matthew Manley was indicted by a federal grand jury charging defendant with one count of civil disorder in violation of 18 U.S.C. § 231(a)(3); one count of assaulting, resisting, or impeding certain officers in violation of 18 U.S.C. § 111(a)(1); one count of assaulting, resisting, or impeding certain officers using a dangerous weapon in violation of 18 U.S.C. § 111(a)(1) and (b); one count of entering and remaining in a restricted building or grounds with a deadly or dangerous weapon in violation of 18 U.S.C. § 1752(a)(1) and (b)(1)(A); one count of disorderly and disruptive conduct in a restricted building or grounds with a deadly or dangerous weapon in violation of 18 U.S.C. § 1752(a)(2) and (b)(1)(A); one count of engaging in physical violence in a restricted building or grounds with a deadly or dangerous weapon in violation of 18 U.S.C. § 1752(a)(4) and (b)(1)(A); one count of disorderly conduct in a capital building in violation of 18 U.S.C. § 5104(e)(2)(D);

and one count of act of physical violence in the capitol grounds of buildings in violation of 18 U.S.C. § 5104(e)(2)(F).

2. Trial in this matter is scheduled to commence on July 20, 2022.

3. Undersigned counsel is currently attached to trial in the matter of *United States v. Dominic Escalera*, Criminal No. 21-316, before the Honorable Edward G. Smith in the Eastern District of Pennsylvania on this date. Accordingly, I respectfully request a brief continuance of thirty (30) days in this matter. Alternatively, counsel suggests the week of August 22, 2022, for the Court's consideration.

4. Under the Speedy Trial Act, Title 18 U.S.C. § 3161(h)(7)(A), (B) and (C), the period of delay resulting from a continuance is excludable where granting the continuance serves the ends of justice and outweighs the best interest of the public and the defendant in a speedy trial.

5. Assistant United States Attorney Robert Juman has advised that he does not oppose this request for a continuance.

WHEREFORE, for the foregoing reasons, the defense respectfully requests that this motion be granted, and the trial be continued for thirty (30) days.

Respectfully submitted,

/s/ Natasha Taylor-Smith
NATASHA TAYLOR-SMITH
Assistant Federal Defender

CERTIFICATE OF SERVICE

I, Natasha Taylor-Smith, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that I have filed and served a copy of the Defendant's Unopposed Motion for Thirty (30) Day Continuance of Trial, by electronic mail upon Zachary Phillips, Assistant United States Attorney.

/s/ Natasha Taylor-Smith
NATASHA TAYLOR-SMITH
Assistant Federal Defender

DATE: March 28, 2022