

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
No. 1:22-CR-34-RBW-1

UNITED STATES OF AMERICA)	
)	
)	
VS.)	UNOPPOSED FIRST MOTION
)	TO CONTINUE SENTENCING
)	
AIDEN HENRY BILYARD,)	
)	
Defendant.)	
_____)	

NOW COMES defendant, Aiden Bilyard, by and through his undersigned counsel, and hereby moves the Court for an order continuing defendant’s sentencing in the above captioned case.

In support of this unopposed motion, defendant states as follows:

1. That defendant was named in an nine (9) count Indictment filed on August 11, 2021, in the United States District Court, District of Columbia, charging defendant with, one (1) count of Civil Disorder, in violation of Title 18, United States Code, Section 231(a)(3)), with one (1) count of assaulting, resisting, or impeding certain officers using a deadly and dangerous weapon, with one (1) count of entering and remaining in a restrict building or grounds with a deadly and dangerous weapon, with one (1) count of disorderly and disruptive conduct in a restricted building or grounds with a deadly and dangerous weapon, with one (1) count of engaging in physical violence in a restricted building or grounds with a deadly and dangerous weapon, with one (1) count of disorderly conduct in a capitol building, with one (1) count of act of physical violence in the Capital Grounds or buildings, with one (1) count of destruction of government property and aiding and abetting, and with one (1) count of parading, demonstrating,

or picketing in a capitol building, all in violation of Title 18, United States Code, Section 231(a)(3)), Sections 111(a)(1)and (b)), Section 1752(a)(1) and (b)(1)(A)), Section 1752(a)(4) and (b)(1)(A)),Sections 1361 and 2 and in violation of Title 40, United States Code, Section 5104(e) (2)(D), Section 5104(e)(2)(F)).

2. That on November 29, 2021, undersigned counsel entered her notice of appearance.

3. That on October 20, 2022, Defendant pled guilty to Count 2 of the indictment.

4. That sentencing was set for February 2, 2023.

5. Undersigned counsel has retained a licensed psychologist to assist in the preparation for sentencing and mitigation as it relates to Mr. Bilyard. We need additional time to finalize the report, and otherwise prepare for sentencing.

6. Further, local counsel, Mr. Smith is scheduled to attend a conference in South Carolina on February 2, 2023.

7. That based on the above reasons undersigned counsel requests that the sentencing date be continued for forty-five days.

8. That this motion is made in good faith and not for the purposes of delay. Neither the government nor the defendant would be prejudiced by the sentencing date being reset.

9. That the undersigned counsel has contacted counsel for the government, Jordan Koenig, regarding the filing of this motion and counsel for the government has indicated he has no objection to the granting of said motion.

WHEREFORE, defendant, Aiden Bilyard, respectfully requests that the sentencing in this matter be continued for an additional forty-five days.

Dated: January 19, 2023.

Respectfully submitted.

By: /s/ Jamie L. Vavonese

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Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned certifies that on the 19th day of January 2023, the foregoing Motion to Continue Sentencing was served through the electronic service function of the Court's electronic filing system as follows:

Jordan Konig

P.O. Box 55
Ben Franklin Station
Washington, DC 20044
Jordan.a.konig@usdoj.gov

This the 19th day of January, 2023.

By: /s/ Jamie L. Vavonese
Counsel for Aiden Bilyard