

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)
)
 v.) USDC No. 22-cr-111-02 (JEB)
)
 Mandy Robinson-Hand, *defendant*.)

UNOPPOSED MOTION TO CONTINUE STATUS HEARING

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., (“counsel”) appointed by this Court under the Criminal Justice Act, moves the Court, with no opposition from the codefendant or from the United States, to continue the status hearing for a period of approximately thirty (30) days from September 1, 2022, at 11:30 a.m., to a date convenient with the Court and parties, to be held remotely by video teleconference. The reasons follow.

1. Defendant is charged in a four-count criminal Information with misdemeanor offenses the government alleges he committed on January 6, 2021, at the United States Capitol. Those offenses are Entering and Remaining in a Restricted Building or Grounds; Disorderly and Disruptive Conduct in a Restricted Building or Grounds; Disorderly Conduct in a Capitol Building; and Parading, Demonstrating, or Picketing in a Capitol Buildings, violations of 18 U.S.C. §§ 1752(a)(1) and (a)(2), and 40 U.S.C. §§5104(e)(2)(D) and (e)(2)(G).

2. The parties are in plea negotiations. Counsel has conferred with the government to request a plea offer for the defendant. The government is preparing an offer, which will need to be approved by supervisors in his office. It is not anticipated that the proposed Plea Agreement and Statement of the Offense will be approved before early next week. Once counsel receives the documents, it will be necessary for him to forward them to his client for her review, and then

review the documents with her. Gregory Smith, Esq., counsel for the codefendant, defendant's husband, Charles Hand, III, will need to do the same with his client. In the circumstances, additional time is needed to conclude the agreement. The parties anticipate that thirty (30) days will be ample time in which to do so.

3. The defendant waives, with no opposition from the government or the codefendant, the tolling of time between September 1, 2022, and the next court date, should the Court grant this request. The defendant and government believe it would serve the interests of justice, as well as conserve the resources of the Court.

5. The defendant requests that the Court continue this matter for further status for a period of thirty (30) days, by which time the parties expect to go forward with a plea hearing.

6. The parties request that the next hearing be conducted remotely by video teleconference, as permitted by the CARES Act and the standing order of Chief Judge Howell.

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 Brian D. Brady, Esq., U.S. Dept. of Justice (CRM), attorney of record for the government in the instant case, and Gregory S. Smith, Esq., attorney for codefendant Charles Hand, III, this 26th day of August, 2022.

/s/

Nathan I. Silver, II