

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

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|---------------------------------|---|---|
| UNITED STATES OF AMERICA | : | CRIMINAL NO. 1:22-CR-15-<i>apm</i> |
| | : | |
| v. | : | |
| | : | |
| JESSICA WATKINS, | : | |
| | : | |
| Defendant | : | |

**DEFENDANT JESSICA WATKIN’S MOTION FOR EXTENSION OF
DEADLINE TO RESPOND TO THE DRAFT PRESENTENCE REPORT**

AND NOW, this 14th day of April 2023, comes the above captioned Defendant, Jessica Watkins, by and through undersigned counsel, Crisp and Associates, LLC and Jonathan W. Crisp, Esquire, and respectfully avers the following:

1. On 26 September 2022, a trial by jury was initiated against Mr. Meggs and his codefendants Rhodes, Watkins, Caldwell, and Harrelson.

2. On 29 November 2022, the jury found Ms. Watkins guilty of the following offenses:
 - a. A violation of 18 U.S.C. § 1512(k): Conspiracy to Obstruct an Official Proceeding
 - b. A violation of 18 U.S.C. §§ 1512(c)(2): Obstruction of an Official Proceeding and Aiding and Abetting
 - c. A violation of 18 U.S.C. § 372: Conspiracy to Prevent an Officer from Discharging Any Duties
 - d. A violation of 18 U.S.C. §§ 231(a)(3): Obstructing Officers During a Civil Disorder

3. The draft Presentence Investigation Report (“PSR”) as to Defendant Jessica Watkins was filed on 24 March 2023.
4. The original deadline to respond to the draft PSR was set for 7 April 2023.
5. On 28 March 2023, Defendant Elmer Stewart Rhode’s filed a Motion to Continue Sentencing Deadlines and All Related Deadlines filed as ECF No. 494.
6. On 29 March 2023, Defendant Jessica Watkins filed a Notice of Joinder of ECF No. 494 filed as ECF No. 499.
7. On 10 April 2023, this Honorable Court issued an order denying Defendant Elmer Stewart Rhode’s Motion to Continue Sentencing Deadlines and All Related Deadlines but granted an extension for the parties to respond to the draft PSR from 7 April 2023 to 14 April 2023.
8. Undersigned counsel is currently speaking to the Texas Bar Association in conjunction with the swearing in of the new United States Attorney and will not be returning until the evening of Friday, 14 April.
9. Undersigned counsel attempted to contact Assistant United States Attorney Kathryn Rakoczy, Assistant United States Attorney Jeffrey Nestler, and Trial Attorney Louis Manzo to obtain their input on the instant filing but was unable to make contact. Undersigned counsel was unable to wait for a response given the impending deadline.

10. Undersigned counsel therefore respectfully requests this Honorable Court grant an extension to respond to the draft PSR from 14 April 2023 to 15 April 2023.

WHEREFORE, for the above stated reasons Defendant respectfully requests this Honorable Court GRANT her motion and extend the deadline to respond to the draft PSR.

Respectfully submitted,

Date: 14 April 2023

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on the individual listed below:

ELECTRONIC SERVICE

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