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., appointed by this Court under the Criminal Justice Act, respectfully moves the Court, with no opposition from either the United States or codefendant Charles Hand, III, to continue the status hearing set for July 1, 2022 at 2 o'clock p.m. for a period of approximately sixty (60) days, to a date convenient with the Court and the parties, for the reasons that follow.

- The defendant and her codefendant are charged in a four count Information with four misdemeanor offenses arising from the protests and eventual riot at the U.S. Capitol on January 6, 2021.
- 2. Counsel for both defendants continue to review pretrial discovery in this case and consult with their clients. The government plans to extend a plea offer to both defendants. Through no fault of current government counsel, the extension of a plea offer was delayed because of a change in counsel. Counsel for the defendants will need additional time in which to review the plea agreement and statement of offense the government proposes to each defendant.
- 3. It will conserve the Court's resources by not having to conduct a status hearing in this case, especially since the request made here would be the only order of business the parties feel would have to be taken up.

- 4. Undersigned counsel has spoken with both the government and counsel of record for the codefendant. Each indicates no opposition to this motion to continue the matter for further status.
- 5. In the interests of justice, the defendants and the United States waive the intervening period between July 1, 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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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Brian D. Brady, Esq., United States Department of Justice (CRM), attorney of record for the government in the instant case, and Gregory Stuart Smith, Esq., attorney for codefendant Charles Hand, III, this 29th day of June, 2022.

/s/	
Nathan I. Silver, II	