

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

UNITED STATES OF AMERICA,

-v-

**RICHARD SLAUGHTER, and
CADEN GOTTFRIED,**

Defendants.

Criminal No.: **1: 22-cr-00354-RCL-1 and 2**

**DEFENDANTS MOTION TO
CONTINUE TRIAL AND AMEND
SCHEDULING ORDER DUE TO
SUPERCEDING INDICTMENT**

COMES NOW Defendants Rick Slaughter and Caden Gottfried, by and through undersigned counsel John Pierce, with this motion for an extension of time for Defendants and Defense counsel to address, research and file pretrial motions regarding the recent Superseding Indictment in this case.

1. The Defendants will waive speedy trial for this continuance.
2. Mr. Slaughter and Mr. Gottfried were arraigned this past week on a superseding indictment alleging a new crime punishable by up to 20 years imprisonment.
3. It appears the government's new allegation involves a claim that defendant Slaughter committed an assault on an officer with a deadly and dangerous weapon.
4. Apparently the basis for this is an allegation that Slaughter handed a cannister of some type of spray to another bystander, who, in turn, may have later sprayed the cannister at an officer.
5. Mr. Slaughter needs time to investigate this claim in terms of the other

individual and or a related prosecution.

6. The superseding indictment also clarifies that Slaughter and Gottfried are alleged to have committed their 231 conduct separately. Thus there are now a larger number of incidents or episodes at issue.

7. Additionally the government has submitted a “formal 404(b) notice” of intent to introduce prior bad act evidence against the defendants.

8. Counsel needs at least another 60 days to study these extra claims and information and prepare for trial.

9. This extra time will allow for counsel to prepare additional Rule 12 motions relating to these new counts and evidence.

Dated: October 25, 2023

Respectfully Submitted,

/s/ John M. Pierce

John M. Pierce

21550 Oxnard Street

3rd Floor, PMB #172

Woodland Hills, CA 91367

Tel: (213) 400-0725

Email: jpierce@johnpiercelaw.com

Attorney for Defendants

CERTIFICATE OF SERVICE

I, John M. Pierce, hereby certify that on this day, October 25, 2023, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce

John M. Pierce