

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

Complainant,

v.

KENNETH HARRELSON
KELLY MEGGS

Accused

Criminal Case No.

1:21-cr-00028 (APM)

MOTION FOR ENLARGEMENT OF PAGE LIMIT

Comes now the Accused KENNETH HARRELSON and KELLY MEGGS, by counsels, hereby requesting that the Court, authorize an enlargement of the 45 page limit regarding a filing that may be of common interest to other January 6th Defendants:

1. Counsels have been drafting a motion and proposed order regarding facts and issues related to detention whereby prisoners are forced to receive medical procedures without informed consent in contravention of numerous laws, both international and domestic, and regulations. Since arrest, the above defendants, along with 32 prisoners at the Department of Corrections have resisted incessant and continual efforts to break them and force them to receive these procedures. An attachment of the most current draft outline of the proposed filing is enclosed.
2. Kelly Meggs reports that he is medically unable to receive the Covid19 vaccine. Kenneth Harrelson reports that taking the Covid19 vaccine presents for him a crisis of faith. Both men believe the Covid19 vaccines present health risks and they should not

punished because they refuse to provide uninformed consent. These Defendants (and presumably others) will argue that these are reasons they should be immediately released.

3. More than one counsel based only on a description of this proposed filing, has expressed an interest in adopting the motion or filing a similar motion before courts inside, but also outside the district.
4. To create a proper record and to frame the facts, evidence and legal issues properly to benefit this Court and to properly serve our clients and humanity, as well as other courts that may be considering similar issues, it is impossible to stay within the page limit. After many reductions and distillations, the most recent draft is around 145 pages.
5. Counsels feel obligated both to properly brief the Court as to unprecedented harms related to continued detention and to ensure that a proper historical and evidentiary record is preserved and remains available in a federal docket.

I. CONCLUSION

For the foregoing reasons, we respectfully request an enlargement as we continue the distillation and condensing process to present the Court with the most concise presentation of the evidence relevant to the continued detention of the above Defendants.

RESPECTFULLY SUBMITTED

/s/ Brad Geyer

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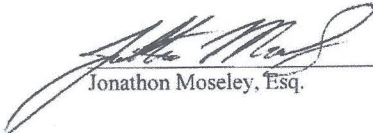
/s/ Jonathon Alden Moseley

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CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2021, a true and accurate copy of the forgoing was electronically filed and served through the ECF system of the U.S. District Court for the District of Columbia.

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