

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

<b>UNITED STATES OF AMERICA</b>	)	
	)	
	v.	)
		<b>CASE NO. 1:22-CR-00092-DLF</b>
		)
<b>BRIAN BINGHAM</b>	)	

**MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS**

**BRIAN BINGHAM**, through Undersigned Counsel, moves the Court for an extension of time of two days, until October 25, 2023 to file an additional pretrial motion to transfer venue. In support of his motion, Mr. Bingham states as follows.

1. Pretrial motions are due to be filed today, October 26, 2023.
2. Mr. Bingham today filed his motion to dismiss four of the six counts in his Indictment.
3. While working to complete his motion to transfer venue, Undersigned Counsel's work computer is repeatedly crashing and restarting after a few keystrokes, preventing him from completing the motion. Undersigned Counsel has a personal computer that he can use to complete his work on this motion. He will likely have to print the motion in its current state and retype it on his personal computer, which should take no more than a day or two.

**WHEREFORE**, Mr. Bingham moves the Court Court for an extension of time of two days, until October 25, 2023 to file an additional pretrial motion to transfer venue.

Dated this 23rd day of October, 2023.

Respectfully submitted,

/s/ Donnie W. Bethel

**DONNIE W. BETHEL**

Bar No.: ASB-7184-F26X

P.O. Box 680431

Prattville, AL 36068

(334-354-6498)

Email: donbethel@att.net

**CERTIFICATE OF SERVICE**

I certify that on October 23, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Respectfully submitted,

/s/ Donnie W. Bethel

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