

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

| | | |
|---------------------------|---|---------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| V. |) | CRIMINAL NO. 21-CR-28-APM |
| |) | |
| |) | |
| BRIAN ULRICH, |) | |
| |) | |
| Defendant. |) | |

UNOPPOSED MOTION FOR ADDITIONAL TIME TO FILE MOTIONS

COMES NOW DEFENDANT BRIAN ULRICH, by and through counsel, who respectfully requests that the Court grant him additional time to file motions that he may deem necessary. Indicted in the Fifth Superseding Indictment (Doc. 328), dated August 4, 2021 and unsealed on August 9, 2021, Mr. Ulrich was arraigned on August 13, 2021. After his arraignment, Mr. Ulrich filed a notice to join two motions to dismiss previously filed by codefendants. (Doc. 351). The Government has also been providing discovery, which is rather voluminous and requires considerable time to digest. Therefore, Mr. Ulrich respectfully requests an extension of time of 60 days to file additional motions. Mr. Ulrich has no objection to the continued exclusion of time from the Speedy Trial calculation. Counsel for the government does not object to this request.

Respectfully submitted,

A. J. Balbo

A. J. Balbo, Esq.
Balbo & Gregg, Attorneys at Law, P.C.
11258 Ford Avenue, Ste. 11
Richmond Hill, Georgia 31324
912-459-1776 – Telephone
912-459-1777 – Facsimile
aj@balbogregg.com
Georgia Bar No. 142606

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of September, 2021, a true and accurate copy of the foregoing was electronically filed and served via the Court's CM/ECF system to all counsel of record.

Respectfully submitted,

/s/ A. J. Balbo

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| Defendant. |) | |

ORDER

Upon the unopposed motion of the defendant, the deadline for filing motions is extended until _____, 2021. The Speedy Trial Act is tolled pursuant to the statute.

SO ORDERED this _____ day of _____, 2021.

Honorable Amit P. Mehta
United States District Judge
District of Columbia District Court