

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	<b>Criminal No. 1:22-cr-00015-APM</b>
<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>THOMAS CALDWELL,</b>	)	
	)	
<b>And</b>	)	
_____	)	<b>Criminal No. 1:21-cr-00028-APM</b>
<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>CONNIE MEGGS,</b>	)	
	)	
<b>Defendants</b>	)	
_____	)	

**CONSENT MOTION TO EXTEND TIME TO  
RESPOND TO GOVERNMENT OPPOSITION ON  
MOTION TO CHANGE VENUE  
[ECF 120 and ECF 662]**

1. Undersigned counsel filed jointly to transfer or change venue in this case to the Eastern District of Virginia, *U.S. v. Rhodes*, ECF 93 and *U.S. v. Meggs*, ECF 654 on April 15, 2022.
2. The government filed its Opposition to the above, *U.S. v. Rhodes*, ECF 120 and *U.S. v. Meggs*, ECF 662 on May 4, 2022.
3. Undersigned Counsel respectfully requests a one-day extension of the deadline for Replies of May 11, 2022, so that the Reply to the above Motion may be filed on Thursday, May 12, 2022.
4. Undersigned counsel is grieving a lost family member and respectfully makes this request for an additional day on this joint filing, which impacts co-counsel’s filing, thus, the joint request.
5. The Undersigned Counsel has conferred with the government counsel, Mr. Nestler and Ms. Rakoczy, and they consent to the relief in this request.

WHEREFORE, Connie Meggs respectfully moves jointly, with David Fischer, that this Honorable Court modify the deadline by one-day to May 12, 2022 for Defendants' Joint Reply on the Motions to Change Venue, *U.S. v. Rhodes*, ECF 93 and *U.S. v. Meggs*, ECF 654.

Respectfully submitted,

/s/ Juli Zsuzsa Haller  
Juli Z. Haller, DC 466921  
The Law Offices of Julia Haller  
601 Pennsylvania Avenue, N.W.  
S. Building, Suite 900  
Washington, DC 20004  
Telephone: (202) 729-2201  
HallerJulia@outlook.com

Counsel for Connie Meggs

/s/ David W. Fischer  
David W. Fischer, Esq.  
Fischer & Putzi, P.A.  
7310 Ritchie Hwy., #300  
Glen Burnie, MD 21061  
(410) 787-0826  
Fischerandputzi@hotmail.com

**Certificate of Electronic Service**

I hereby certify that on May 10, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, with consequent service on all parties of record.

/s/ Juli Z. Haller

/s/ David W. Fischer