

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

UNITED STATES OF AMERICA,

-v-

DEREK COOPER GUNBY,

Defendant.

Criminal No.: 21-cr-626

**DEFENDANT GUNBY'S CONSENT  
MOTION FOR FIVE DAY EXTENSION OF  
TIME TO FILE MEMORANDA IN REPLY  
TO UNITED STATES' OPPOSITIONS**

Defendant Derek Cooper Gunby, with the United States' consent, hereby moves for a five-day extension of time for Defendant Derek Cooper Gunby to file his memoranda in reply to the United States' Oppositions to Defendant's Motions to Dismiss and Motion to Transfer Venue (ECF No. 40, 41, 42, 43). The current reply deadline is November 4, 2022.

1. On October 7, 2022, Defendant Derek Cooper Gunby filed a Motion to Dismiss the Case on First Amendment Grounds (ECF No. 35); a Motion to Change Venue to the District of South Carolina, Greenville Division (ECF No. 36); a Motion to Dismiss Count One of Two "Disorderly Conduct" Counts Due to Multiplicity (ECF No. 37); and a Motion to Dismiss the Information for Failure to State a Claim (ECF No. 38).
2. On October 28, 2022, the United States filed an Opposition to Defendant's Motion to Dismiss for Failure to State a Claim (ECF No. 40); an Opposition to Defendant's Motion to Dismiss on First Amendment Grounds (ECF No. 41); an Opposition to Defendant's Motion to Dismiss counts Two or Three on Multiplicity Grounds (ECF No. 42); and an Opposition to Defendant's Motion to Transfer Venue (ECF No. 43).
3. Counsel for Defendant Derek Cooper Gunby is currently preparing memoranda in reply to the United States' Oppositions. However, Counsel requires additional time to accommodate undersigned counsel's deadlines in other cases. Defendant Derek Cooper

Gunby therefore seeks an extension of five days, from November 4, 2022, to November 9, 2022, to file his memoranda in reply.

WHEREFORE, Defendant Derek Cooper Gunby respectfully requests that the Court extend until November 9, 2022, the deadline for Defendant Derek Cooper Gunby to file his memoranda in reply to the United States' Oppositions. The United States consents to this request.

Date: November 3, 2022

Respectfully Submitted,

/s/ John M. Pierce

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Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that, on **November 3<sup>rd</sup>, 2022**, this motion and the accompany declaration was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce

John M. Pierce