

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>CASE NO.: 1:21-CR-599 (RBW)</b>
	:	
<b>DONNIE DUANE WREN and</b>	:	
	:	
<b>THOMAS HARLEN SMITH</b>	:	
	:	
<b>Defendants.</b>	:	

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

The United States of America, by and through undersigned counsel, respectfully requests additional time to respond to defendants’ pretrial motions for the reasons discussed below.

1. On November 15, 2022, the defendants filed a joint motion to continue the trial date and for an extension of time to file pretrial motions. ECF 45. The Court granted the motion on November 28, 2022. ECF 50. Specifically, the Court continued the trial to April 17, 2023, and ordered the parties to file their pretrial submissions on or before February 24, 2023. ECF 50. The Court did not set a new deadline for oppositions/responses and replies.

2. On February 23 and 24, defendants filed a total of 11 pretrial motions. *See* ECF Nos. 54-61, 66 and 67. One of the motions filed by Defendant Wren, for instance, is a 47-page Motion to Dismiss Count 2 of the Indictment—the charge of Civil Disorder, which Defendant Wren characterizes as a “racist statute. ECF 56. The motion is accompanied by eight exhibits. ECF 56-2—56-9. The Court, on March 1, entered an order requiring the parties to file any oppositions to the pretrial motions by March 6, 2023, no later than 5pm. ECF 68.

3. Government counsel is requesting a period of 3 weeks, until March 17, to file its oppositions/responses to these motions. AUSA Tighe Beach is currently preparing for trial in

*United States v. Hatchet Speed*, 22-cr-244 (TNM), which begins on March 2 and is expected to last two days. AUSA Beach will not have adequate time to focus on preparing oppositions to the defendants' motions until the week of March 6. Trial Attorney Alsworth is working diligently to prepare oppositions to the defendants' motions but does not anticipate having oppositions completed for each of the motions by March 6.

3. The parties have conferred, and the defendants' counsel do not oppose the government's request for additional time to respond to the pretrial motions.

Respectfully submitted,

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