IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 21-cr-246 (ABJ)
	)	
	)	
EDWARD BADALIAN	)	

Defendant's Unopposed Motion for Extension to Respond to Government Motions in Limine

Edward Badalian, through his Attorney, Robert M. Helfend, respectfully files this motion for an extension of time to file a response to the governments motions in limine and in support states the following:

The scheduling order entered by this honorable Court states that responses to Government motions in limine are due on January 13, 2023. *See* ECF No. 122. Both undersigned counsel and *pro hac vice* counsel, Ms. West, are unable to file the response by January 13, 2023, due to unforeseen circumstances. Also, Ms. West is inundated with other January 6 cases and a D.C. Circuit appeal with a January 18, 2023 deadline. Therefore, undersigned counsel respectfully requests that a short extension until January 17, 2023 be granted in which to file responses to the motions in limine filed by the Government.

Undersigned counsel conferred with AUSA Paschall who does not oppose this motion.

Respectfully submitted,

By: /s/

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CERTIFICATE OF SERVICE

I hereby certify on the 13th day of January, 2023 a copy of same was electronically filed using the CM/ECF system and thus delivered to the parties of record and in pursuant to the rules of the Clerk of Court.

/s/ Kira Anne West