

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

UNITED STATES OF AMERICA,

v.

EDWARD JACOB LANG,

Defendant.

No. 1:21-cr-00053

DEFENDANT LANG'S MOTION TO AMEND SCHEDULING ORDER

Defendant, Edward Jacob Lang, by and through undersigned counsel, Robert L. Jenkins, Jr., respectfully moves this Court to amend the Scheduling Order entered on July 5, 2022. In support of which, undersigned counsel states the following:

1. On or about October 7, 2022, undersigned counsel entered his appearance in this matter. Since that time, counsel has endeavored to become familiar with facts and law governing this matter in order to assist in the defense.
2. In particular, undersigned counsel is engaged in the preparation of the defendant's reply to the government's motion in to preclude the defendant from raising certain defenses predicated on the 1st Amendment.
3. A brief extension of time for the defendant to file his reply would not prejudice the government.
4. A brief extension of time for the defendant to file his reply would be in the interest of justice.
5. A brief extension of time would permit undersigned counsel the opportunity to participate in the drafting of an appropriate reply.

Full Text

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assist in the defense. 2. In particular, undersigned counsel is engaged in the preparation of the defendant's reply the government's motion in to preclude the defendant from raising certain defenses predicated on the 1st Amendment. 3. A brief extension of time for the defendant to file his reply would not prejudice the government. 4.

The government defers to the court as to whether to extend Defendant's Reply. A brief extension of time for the defendant to file his reply would be in the interest of justice. 5. A brief extension

of time would permit undersigned counsel the opportunity to participate in the drafting of an appropriate reply. Page 1 of 2 6. Consequently, I am respectfully requesting that Defendant Reply brief which was due October 7,

2022 be extended to on or before October 21, 2022. 7. The government defers to the court as to whether to extend Defendant's Reply deadline. I ASK FOR THIS: _____ Robert L. Jenkins, Jr., Esq.

I ASK FOR THIS: _____ Robert L. Jenkins, Jr., Esq. Bynum & Jenkins Law U.S. District Court Bar No.: CO0003 1010 Cameron Street Alexandria, VA 22314 (703) 309 0899 Telephone (703) 549 7701 Fax RJenkins@BynumAndJenkinsLaw.com Counsel for Defendant

EDWARD JACOB LANG CERTIFICATE OF SERVICE I hereby certify that I caused a true and accurate copy of the foregoing to be served on all counsel of record via ECF on this October 14, 2022. _____

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Counsel for Defendant EDWARD JACOB LANG Page 2 of 2 Bynum & Jenkins Law

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Counsel for Defendant EDWARD JACOB LANG

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