

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

UNITED STATES OF AMERICA

v.

ENRIQUE TARRIO,

Defendant.

Crim. Action No. 21-175-5 (TJK)

**UNOPPOSED MOTION TO CONTINUE DEADLINE FOR
RESPONSE TO MOTION**

The United States of America, through undersigned counsel, hereby requests that the Court modify its May 24, 2022, Minute Order to permit the government until June 2, 2022, to respond to defendant Tarrío's motion to change venue, with any reply by the defendant to be filed no later than June 9, 2022. In support of this motion, the government states as follows:

1. On April 22, 2022, the Court filed a pretrial scheduling order, directing the parties to file any motions by June 15, with oppositions to be filed by June 29, 2022, and replies to be filed by July 6, 2022. ECF No. 346, ¶ 2.

2. On May 2, 2022, defendant Tarrío filed a motion to change venue, ECF No. 349. Government counsel mistakenly believed that the response date for this venue motion was, consistent with the scheduling order, June 29, 2022. *See* LCrR 47(b) ("Within 14 days of the date of service *or at such other time as the Court may direct*, an opposing party shall serve and file a memorandum of points and authorities in opposition to the motion") (emphasis added).

3. On May 24, 2022, the Court entered a Minute Order directing the government to file any response by May 27, 2022.

4. Given the undersigned counsel's good-faith mistaken belief that the due date was not until the end of June, the government respectfully requests an extension of the deadline to file a response to the defendant's motion.

5. Undersigned counsel has reached out to Nayib Hassan and Sabine Jaruegui, Esqs., who represent Mr. Tarrío. Mr. Hassan represented to undersigned counsel that he does not oppose the relief requested in this motion, specifically that the government file its opposition to ECF No. 349 by June 2, 2022, and that Mr. Tarrío be given until June 9, 2022 to file any reply.

6. Accordingly, the government requests that the Court grant the attached proposed order, modifying the schedule for responses and replies accordingly.

Respectfully submitted,

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