

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

UNITED STATES OF AMERICA)	
)	No. 1:21-cr-00028-APM-15
v.)	
JASON DOLAN)	
Defendant)	

**DEFENDANT JASON DOLAN’S MOTION TO EXTEND TIME FOR FILING
PRETRIAL MOTIONS**

Jason Dolan, by and through his undersigned counsel, Michael T. van der Veen, respectfully requests a 60-day extension on the motion deadline in this matter. In support of this motion, counsel states the following:

1. On May 26, 2021, a United States District Court for the District of Columbia Grand Jury formally indicted Defendant.
2. Mr. Dolan is before this Court, pending trial in this matter.
3. Undersigned counsel was retained on May 28, 2021.
4. At the last status listing, the Court granted the Government’s motion in part for an exclusion of speedy trial time and set a July 2, 2021, deadline for pretrial motions in this matter.
5. Counsel for the Government has turned over excessive amounts of discovery since the last listing, which was June 11, 2021.
6. Defendant respectfully requests that this Honorable Court grant Defendant’s Motion to Extend because the interests of justice require defense additional time to review and prepare.

7. The Government, through Assistant United States Attorney Jeffrey Nestler, has no objection to the instant request.

WHEREFORE, Defendant, Jason Dolan, respectfully requests that this Honorable Court grant his request for a 60-day extension of the motion deadline.

VAN DER VEEN, O'NEILL, HARTSHORN, AND LEVIN

DATE: 06/29/21

BY: /s/ Michael T. van der Veen
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