

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

UNITED STATES OF AMERICA

v.

MITCHELL TODD GARDNER II

Case No. 1:21-cr-00622-APM

DEFENDANT’S MOTION FOR LEAVE TO LATE FILE PRETRIAL MOTIONS

Mitchell Todd Gardner II, by and through undersigned counsel, respectfully moves this Honorable Court for leave to late file his: 1) Motion to Dismiss Counts One, Two, Five, Six, and Seven of the Indictment; 2) Motion to Suppress Witness 1’s Photo Identification; and 3) Motion to Transfer Venue.

On June 9, 2022, this Court set a deadline for June 16, 2022 for Mr. Gardner to file pre-trial motions. Due to unforeseen complications in the above-listed matter and other ongoing matters, counsel required an additional day to file the attached

WHEREFORE, counsel respectfully requests leave to late file the aforementioned motions.

Respectfully submitted,

_____/s/_____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of June 2022, I caused a true and correct copy of the foregoing Motion to for Leave to Late File Pretrial Motions to be delivered via CM/ECF to all parties in this matter.

_____/s/_____
David B. Benowitz