

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
 v.)
)
 RICHARD BARNETT,)
)
 Defendant.)

Case No. 1:21-cr-00038 (CRC)

**DEFENDANT'S MOTION TO EXTEND TIME TO SUBMIT ITS JURY
INSTRUCTIONS AND VERDICT FORM AND COMMENTS**

1. Comes now the Defendant, Richard Barnett, by and through undersigned attorneys, and respectfully moves this court to grant his motion to extend time to January 30, 2022 for submission of Jury Instructions and verdict form.
2. The Court’s deadline for the jury instructions and verdict form is today, December 27, 2022.
3. The defense received the Government’s suggested submission today, December 27, 2022, at 3:40 PM EST.
4. We did not have enough time to work with the Government on this matter.
5. In the spirit of collegiality and working together, however, we suggested to the Government that we jointly ask for time to please this Honorable Court with a joint submission.
6. The Government, unfortunately, feeling bound by the original scheduling order, declined our request.
7. Significant unresolved issues remain regarding the jury instructions, particularly in light of the newly charged yet still unindicted felony count, which necessitates a complete reevaluation of how we defend Mr. Barnett’s case.
8. Therefore, and for the reasons stated above, we respectfully ask this Honorable Court to extend today’s deadline for joint submission to Friday, December 30, 2022

Dated December 27, 2022

Respectfully submitted,

/s/ Jonathan Gross
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CERTIFICATE OF SERVICE

I hereby certify on the 27th day of December 2022, a copy of the foregoing was served upon all parties as forwarded through the Electronic Case Filing (ECF) System.

/s/ Jonathan Gross
Jonathan Gross