

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

ROBERT GIESWEIN,

Defendant.

Crim. Action No. 21-24-1 (EGS)

**JOINT MOTION TO CONTINUE DEADLINE FOR
MOTIONS AND RESPONSES**

The United States of America, through undersigned counsel and on behalf of both parties, hereby requests that the Court modify its February 15, 2022, Minute Entry to permit the parties more time to file motions new motions relating to the Superseding Indictment and motions *in limine*, and to extend the briefing schedule for currently pending motions. In support of this motion, the parties state the following:

1. At a hearing on January 19, 2022, the Court rescheduled the trial, which it then set to begin on April 20, 2022. In the interim, the Court set deadlines for new motions and responses to pending motions, in anticipation of an April 12, 2022, motions hearing date. *See* Minute Entry dated February 15, 2022. The Court later vacated the April 20 trial date and converted it to a motions hearing date, while also vacating the April 12 motions hearing date. *See* Minute Order dated February 16, 2022.

2. The parties request that the Court adjust the briefing schedule for new and pending motions, commensurate with the adjustment of the motions hearing date. We propose the following dates:

- Any new motions shall be filed no later than March 16, 2022;
- All responses to new motions, along with presently pending ECF No. 100, shall be filed no later than March 30, 2022; and
- Any replies shall be filed no later than April 6, 2022.

3. Additionally, as previously noted, neither party intends to object to the other's filing motions *in limine* as they become aware of the opposing party's intent to offer particular evidence closer to trial. At the January 19, 2022 hearing, the Court agreed that parties cannot be expected to anticipate and object to every potential exhibit until exhibit lists are filed.

4. Undersigned counsel has provided a copy of this motion and the attached proposed order to Ann Mason Rigby and Elizabeth Mullin, counsel for Mr. Gieswein, and counsel for Mr. Gieswein has indicated that undersigned counsel may file this as a joint request.

Respectfully submitted,

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