



2. On Tuesday, March 23, 2021, the government filed its Government's Memorandum in Opposition to Defendant Ronald Sandlin's Motion for Bond (Opposition). In its Opposition, the government makes extensive reference to posts that Mr. Sandlin allegedly made to his Facebook page and to messenger chats he was allegedly involved in on Facebook. The vast majority of this information was obtained by the government with a search warrant. On Monday, March 22, 2021, the government turned over to undersigned counsel the search warrant return from Facebook that contains the above-described information. The return is a .pdf document that is almost 7000 pages, and materials in the document are not organized in way that is apparent.

3. In order to address the arguments that the government makes in its Opposition, undersigned counsel needs more time to review the Facebook search-warrant return before Mr. Sandlin's bond hearing. Accordingly, Mr. Sandlin moves the Court to continue his bond hearing from Thursday, March 24, 2021 to Thursday, April 1, 2021 or another date close in time that is agreeable to the Court and the parties.

4. On Wednesday, March 23, 2021, undersigned counsel spoke by phone with Assistant United States Attorney Jessica Arco. Ms. Arco graciously indicated that the government would not oppose a motion by Mr. Sandlin to continue his bond hearing—provided that Mr. Sandlin agrees to waive his speedy-trial rights from March 24, 2021 to whatever date the hearing is continued to. Undersigned counsel has spoken to Mr. Sandlin about this, and counsel represents that Mr. Sandlin does agree to such waiver of his speedy-trial rights. AUSA Arco indicated that she would not be available to do Mr. Sandlin's bond hearing on Wednesday, March 31, 2021.

WHEREFORE, the defendant, Ronald Sandlin, moves this Honorable Court to continue his bond hearing in this case from Thursday, March 25, 2021 to Thursday, April 1, 2021 or another date close in time that is agreeable to the Court and the parties

Respectfully submitted,

/s/

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