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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES						*					
VS.							Case	Case No.: 21-CR-28-APM			
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CONSENT MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS

COMES NOW, the Defendant, Thomas E. Caldwell, by and through his attorney, David W. Fischer, Esq., and respectfully requests that the Court extend the time for filing pretrial motions for 60 days, and in support of said motion states as follows:

- 1. The Government consents to the present request.
- 2. At the last Status Hearing, the Court set a deadline of July 1, 2021 for the filing of pretrial motions pursuant to Fed. R. Crim. P. Rule 12(b).
- 3. Since the last hearing, the Government has continued to produce voluminous discovery, including hundreds of FBI files, videos, social media files, and other materials.
- A number of the motions to be filed in this case involve complex issues that require challenges that cannot be adequately addressed without review of the additional discovery.
- 5. The expansion of the conspiracy to include a total of 16 defendants, a number of unnamed individuals, and at least one defendant charged in a separate indictment, who is alleged to be a member of the Oath Keepers, has also increased the time necessary to review discovery.

6. Despite due diligence, counsel has been unable to review all the discovery, fully research the issues, and prepare the necessary motions.

WHEREFORE, the Defendant respectfully requests that the Court extend the time for

filing pretrial motions for 60 days to and including September 1, 2021.

/s/ David W. Fischer, Esq. Federal Bar No. 023787 Law Offices of Fischer & Putzi, P.A. Empire Towers, Suite 300 7310 Ritchie Highway Glen Burnie, MD 21061 (410) 787-0826 Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of July, 2021, a copy of the foregoing Consent Motion to Extend Time to File Pretrial Motions was electronically filed with the Clerk of the United States District Court using CM/ECF, with a notice of said filing to the following:

Counsel for the Government:

Office of the United States Attorney 555 4th Street, NW Washington, DC 20001

/s/ David W. Fischer, Esq.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES							<					
VS.						*	° C	Case No.: 21-CR-28-APM				
THOMAS E. CALDWELL						*						
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<u>ORDER</u>

Upon consideration of the Defendant's Consent Motion to Extend Time to File Pretrial Motions, it is this hereby ORDERED by the United States District Court for the District of Columbia, that the Motion is GRANTED and thus, the Pretrial Motions deadline is extended to September 1, 2021.

Date

Honorable Amit P. Mehta United States District Court