

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
WASHINGTON, D.C.

UNITED STATES OF AMERICA

v.

CRIMINAL CASE NO.  
1:21-CR-00116-DLF

WILLIAM MCCALL CALHOUN, JR.  
*Defendants.*

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**MOTION FOR AN EXTENSION OF TIME**  
**TO FILE ALL PRETRIAL MOTIONS**

COMES NOW, Defendant, William McCall Calhoun, Jr., by and through undersigned counsel, Jessica N. Sherman-Stoltz, and herby files this motion for additional time for the deadline of the filing of *all* pretrial motions.

(1)

On February 12, 2021, Defendants Nalley and Calhoun were indicted on charges alleging obstruction of an official proceeding, unlawful entry into the Capitol, and disruptive conduct in the Capitol. (Doc. 1). The charges stem from the events of January 6, 2021.

(2)

On February 17, 2021, Mr. Nalley made his initial appearance in the Northern District of Georgia. On February 19, 2021, Mr. Nalley was released on bond. Mr. Calhoun

was initially detained in Georgia, but on March 10, 2021, was released on bond conditions set in the District of Columbia. (Doc. 23).

(3)

On May 4, 2021, Mr. Nalley and his co-defendant Mr. Calhoun appeared, via Zoom, for a status conference before the Court. Most recently the parties appeared, again via Zoom, for a fourth status conference on October 5, 2021. Since that hearing the Court set an extended deadline of November 29, 2021 for Defendants' pretrial motions to be filed, and scheduled the next status hearing for December 2, 2021.

(4)

As of the date of this filing, Defendant, William Calhoun, has filed a couple Motions to Modify Pretrial Conditions, and a Motion to Dismiss Count One. Defendant plans on filing additional motions related to his case.

(5)

As of the date of this filing, the defendants have been advised that they have received all the discovery pertaining to their specific cases, and most of the global discovery. Most recently defense counsel received a large volume of discovery on November 24, 2021. Undersigned counsel and her client have not yet been able to review all of the Rule 16 discovery most recently received, and consequently are filing this motion requesting additional time for both of them to completely review and strategize

with one another, discuss possible alternative resolutions with the Government's attorney, and file any necessary additional and final motions.

(6)

In consideration of the above, counsel requests that the Court extend the filing deadline for all final pretrial motions to December 29, 2021.

(7)

Undersigned counsel contacted the Government's attorney for consent to this Motion, but had not heard back by the time this Motion needed to be timely filed.

WHEREFORE, Defendant respectfully requests that the Court grant his motion and reset his filing deadline for final pretrial motions to December 29, 2021.

A proposed Order is included.

Respectfully submitted, this 29th day of November, 2021.

*/s/ Jessica N. Sherman-Stoltz*  
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CERTIFICATE OF SERVICE

I hereby CERTIFY that on this the 29th day of November 2021, a true and correct copy of the foregoing *Joint Motion for an Extension of Time to File All Pretrial Motions* with the Clerk of Court via the CM/ECF system, which will automatically send an email notification of such filing to all counsel of record.

/s/ Jessica N. Sherman-Stoltz  
Jessica N. Sherman-Stoltz, Esq.  
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