

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.
Defendant.

**UNOPPOSED 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 without opposition of the Assistant United States Attorney, and hereby files this motion for additional time for the deadline of the filing of *all* pretrial motions.

(1)

On February 12, 2021, Defendant was 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)

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

(3)

On May 4, 2021, Mr. Calhoun appeared, via Zoom, for a status conference before the Court. Most recently Mr. Calhoun appeared, again via Zoom, for a fifth status conference on December 2, 2021. At that status hearing the Court set an extended deadline of December 29, 2021, for Defendant's pretrial motions to be filed, and scheduled the next status hearing for February 1, 2021.

(4)

As of the date of this filing, Defendant has filed a Motion to Dismiss Count One. Defendant plans on filing additional motions related to his case, if his case moves forward to a trial.

(5)

On December 21, 2021, Defendant received volume 9 of the global discovery pertaining to his case.

(6)

On December 30, 2021, Defendant received a plea offer from the Government. Undersigned counsel and Defendant are requesting additional time to discuss the plea offer that was received today and decide the direction Defendant will be taking in his case, and then file any necessary additional and final motions if his case were to proceed to trial.

(7)

In consideration of the above, counsel requests that the Court extend the filing deadline for all final pretrial motions to January 31, 2022. The attorney for the Government does not oppose this extension.

WHEREFORE, Defendant respectfully requests that the Court grant his unopposed motion for extension of time and reset his filing deadline for final pretrial motions to January 31, 2022.

A proposed Order is included.

Respectfully submitted, this 30th day of December 2021.

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

I hereby CERTIFY that on this the 30th day of December 2021, a true and correct copy of the foregoing *Unopposed 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.
Virginia State Bar #90172
Sherman-Stoltz Law Group, PLLC.