

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

UNITED STATES OF AMERICA

v.

WILLIAM MCCALL CALHOUN, JR.
Defendant.

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

**UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TO FILE ADDITIONAL PRETRIAL MOTIONS**

COMES NOW, Defendant, William McCall Calhoun, Jr., by and through undersigned counsel, and without opposition of the Assistant United States Attorney, and herby files this motion for additional time for the filing of *all* additional pretrial motions.

(1)

On February 12, 2021, Defendant was indicted on three counts, alleging obstruction of an official proceeding, unlawful entry into the Capitol, and disruptive conduct in the Capitol. (ECF Doc. #6). The charges stem from the events of January 6, 2021, at the Capital Building, in the District of Columbia.

(2)

On January 12, 2022, the Government filed a superseding indictment, charging Defendant with five counts, and again alleging obstruction of an official proceeding,

unlawful entry into the Capital, disruptive conduct in the Capital, and the additional counts of disorderly and disruptive conduct in a restricted building or grounds, and parading, demonstrating, or picketing in a Capital Building. (ECF Doc. #83).

(3)

Most recently Mr. Calhoun appeared, via Zoom, for a sixth status conference on January 24, 2022. At that status hearing the Court set an extended deadline of March 21, 2022, for all of Defendant's pretrial motions to be filed, and scheduled the seventh status hearing for April 21, 2022.

(4)

As of the date of this filing, Defendant has filed several Motions. Defendant plans on filing 2-3 additional motions related to his case.

(5)

On December 21, 2021, Defendant received volume 9 of the global discovery pertaining to his case. On January 19, 2022, Defendant received volume 10 of the global discovery pertaining to his case. On February 3, 2022, Defendant received volume 11 of the global discovery pertaining to his case. Many of the documents in the later installments of global discovery require the installation and use of Relativity, an online document review database which the government is using to host their documents. Counsel for Defendant needs a Relativity license and needs to participate in a training (or select one person from her defense team to take the lead on using Relativity). Due to other

Court commitments, defense counsel has not been able to participate in one of the pre-scheduled Relativity trainings that have been offered. Defendant plans on filing at least two additional motions in which Relativity will be needed to review discovery documents pertaining to the motions.

(6)

Additionally, Defendant plans on filing a Motion in Limine with respect to the use of Defendant's alleged social media posts during his trial (of which were provided to the Government by a third-party source and not authenticated and with no apparent disclosed chain of custody – as of yet). Defendant would prefer to wait until official social media records have been received, to verify the accuracy and legitimacy of any social media posts the Government intends upon using in the prosecution of the Defendant.

(7)

In consideration of the above, counsel requests that the Court extend the filing deadline for *all final* pretrial motions to a date to be determined by the Court once a trial date has been set in the case at hand. The attorney for the Government does not oppose an extension, if they are afforded ample response time prior to the trial date.

WHEREFORE, Defendant respectfully requests that the Court grant his unopposed motion for extension of time for the filing of additional and final pretrial motions.

Respectfully submitted, this 22nd day of March 2022.

/s/ Jessica N. Sherman-Stoltz
JESSICA N. SHERMAN-STOLTZ, ESQ.
VIRGINIA STATE BAR NO. 90172
Attorney for William McCall Calhoun, Jr.
Sherman-Stoltz Law Group, PLLC.
P.O. Box 69, Gum Spring, VA 23065
(540) 451-7451; Fax (540) 572-4272
jessica@sslawgroupva.com

CERTIFICATE OF SERVICE

I hereby CERTIFY that on this the 22nd day of March 2022, 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.