

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	CASE NO. 1:21-CR-00116 DLF
v.	:	
	:	
WILLIAM McCALL CALHOUN	:	
	:	
Defendant.	:	

**UNITED STATES’ UNOPPOSED MOTION TO EXTEND MOTION
RESPONSE DEADLINE**

The United States hereby moves this Court for an extension of time to file its responses to the Defendant Calhoun’s Motion to Change Venue and Memorandum of Law (ECF 99) and Defendant Calhoun’s Motion to Dismiss Count One (ECF 101), and in support of its motion states:

1. Defendant Calhoun filed his motions on March 21, 2022. ECF 99 and 101.¹
2. Pursuant to Local Criminal Rule 47(b), the United States’ responses are due on or before April 4, 2022.
3. Despite due diligence, undersigned government’s counsel is unable to adequately respond to the motions by April 4, 2022. As a remote detailee, counsel is handling a number of cases related the January 6, 2021 Capitol riots that have required her attention. Further, and more urgently, she has been preparing for a jury trial in *United States v. Dustin Thompson*, Cr. No. 21-161 in front of Senior Judge Reggie Walton that is set to begin on April 11, 2022.

¹ Defendant Calhoun also filed a Motion to Modify Conditions of Release on March 21, 2022 (ECF 100). The United States will respond timely to that motion.

