

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

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**DEFENDANT'S UNOPPOSED MOTION TO EXTEND THE REPLY  
DEADLINE TO THE GOVERNMENT'S RESPONSE BRIEFS**

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 to extend the reply deadline to the Government's response briefs to Defendant's Motion for a Changes of Venue (ECF Document Number 99) and Defendant's Motion to Dismiss Count One of the Superseding Indictment (ECF Document Number 101).

(1)

Defendant filed the above-noted motions on March 21, 2022.

(2)

The Government filed its responses on April 25, 2022.

(3)

The Speedy Trial Act has been tolled until the next status conference, currently scheduled for June 9, 2022.

(4)

Counsel for the United States does not oppose the relief requested in this Motion.

(5)

Due to changes in Virginia's laws regarding jury trial sentencing, counsel for Defendant has had a large increase in the number of jury trials that her state defendant clients have been scheduling. In addition to other filing and response deadlines, counsel needs additional time to reply to the Government's responses to ECF Document numbers 99 and 101.

WHEREFORE, Defendant respectfully requests that the Court grant an extension of time for the filing of his replies to the Government's responses to Defendant's Motion to Change Venue and Defendant's Motion to Dismiss Count One of the Superseding Indictment until Monday, May 9, 2022.

Respectfully submitted,  
WILLIAM MCCALL CALHOUN  
*By counsel*

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

I hereby CERTIFY that on this the 2nd day of May 2022, a true and correct copy of the foregoing *Defendant's Unopposed Motion to Extend the Reply Deadline to the Government's Response Briefs* 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  
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