

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

CHRISTOPHER RAY GRIDER

Defendant.

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No. 1:21-cr-00022-CKK

**UNOPPOSED MOTION TO CONTINUE JULY 6 DEADLINE TO RESPOND BY TWO  
DAYS**

The United States of America, with no objection from the defendant, hereby moves this Court for a two-day continuance of its deadline to respond to the defendant’s motion to dismiss certain counts in the Superseding Indictment. In support of this unopposed motion, the government states as follows:

1. The parties submitted a joint briefing schedule on June 6, 2022, which the Court signed on June 7, 2022. Order, Dkt. 100. That briefing schedule included deadlines of June 22, 2022 for certain pretrial motions, and of July 6 for responses to the motions. *Id.*
2. The defendant filed a motion to dismiss certain counts of the Superseding Indictment by the June 22 deadline. Def’t Mtn, Dkt. 101.
3. Understanding that the parties negotiated the current deadline and the Court ordered the deadlines as requested, the government respectfully requests that the Court grant a two-day continuance of the July 6 deadline to respond to the motion, for a new deadline of July 8, 2022.
4. In support, the government submits that the proposed continuance would only delay the Court’s ability to rule on the motion by two days, and therefore, the motion would

be ripe at approximately the same time that was contemplated by the Court's scheduling order. No other deadlines would be disturbed as a result of granting the requested relief. The trial date would also remain undisturbed.

5. In addition, the Court, in a Minute Order, waived the page-limit requirement contained in the Local Rules. Minute Order, June 23, 2022. In its Order, the Court indicated that the breadth and complexity of the legal issues in the motion allowed for the response and reply briefs to be lengthier than contemplated in the Local Rules. Given this, the government also submits that two additional days would enable the government to ensure that it completely briefs all legal issues raised in the motion.
6. The requested relief does not prejudice the defendant, and instead will ensure that the parties fully brief the legal issue that the defendant seeks to resolve in advance of trial.
7. In summary, the requested relief is the first such request by the government in this case, it is very limited in duration, it will not delay any proceedings, and it will not prejudice the defendant.

8. The defendant does not object to this continuance.

WHEREFORE, the parties respectfully request that this Court grant the motion for a two-day continuance of motions response deadline to July 8, 2022.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 28, 2022, I caused a copy of the foregoing motion to be served on counsel of record via electronic filing.

/s/ Cindy J. Cho  
CINDY J. CHO  
Assistant United States Attorney