

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BRADLEY STUART BENNETT,

Defendant.

:
:
:
:
:
:
:
:
:

Case No. 21-CR-312 (JEB)

**MOTION FOR ONE-DAY EXTENSION OF
TIME TO RESPOND TO MOTION TO DISMISS**

The government's response to defendant Bradley Bennett's Motion to Dismiss the Indictment (ECF No. 103) is due today, September 5, 2023. The Motion claims, among other things, that Count One fails to properly allege all the elements of the charged offense. *See, Motion*, ECF No. 103, at 6-13. The government intends to seek a superseding indictment tomorrow, on September 6, 2023, to modify the language in Counts One, Two, and Three of the indictment. The government does not intend to seek additional charges. The government therefore respectfully requests that the Court extend the deadline to respond to the Motion to Dismiss by one day—to September 6, 2023—to allow the government time to present the superseding indictment to the Grand Jury. Counsel for the defendant opposes this one-day extension.

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar No. 481052

DATED: September 5, 2023

By: /s/ Anna Z. Krasinski
ANNA Z. KRASINSKI
Assistant United States Attorney
New Hampshire Bar No. 276778
United States Attorney's Office
Detailed from the District of New Hampshire

(202) 809-2058
anna.krasinski@usdoj.gov

NIALAH S. FERRER
Assistant United States Attorney
New York Bar No. 5748462
United States Attorney's Office
District of Columbia
(202) 557-1490
nialah.ferrer@usdoj.gov