

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-175-2 (TJK)
	:	
JOSEPH BIGGS,	:	
	:	
Defendant.	:	

**PARTIES’ JOINT MOTION TO ADJUST DEADLINES IN CONNECTION WITH DEFENDANT
BIGGS MOTION TO REOPEN HEARING AND FOR RELEASE FROM DETENTION**

The Parties hereby respectfully move this Court for an Order to adjust the filing deadlines in connection with Defendant Biggs’ Motion to Reopen Hearing and for Release from Detention (the “Motion to Reopen”). ECF 137. The adjustment to the filing deadlines would allow Defendant Biggs to file a supplement to the Motion to Reopen and provide sufficient time for the parties to file the necessary opposition and reply briefing 14 and 21 days (respectively) after the filing of Defendant Biggs’ supplemental filing.

In support of this motion, the Parties state the following:

1. On Sunday, August 8, 2021, Defendant Biggs filed the Motion to Reopen. Under the local rules, the government’s opposition to Defendant Biggs’ motion is due Monday, August 23, 2021, absent further action from the Court.

2. On Monday, August 23, 2021, Defendant Biggs advised government counsel that Defendant Biggs intended to supplement Biggs’ Motion to Reopen with an additional filing on August 23 or August 24, 2021. Defendant Biggs suggested to government counsel that a consolidated opposition by the government would increase judicial economy by reducing the number of briefs filed with the Court.

3. While the government is prepared to file its opposition on August 23, 2021, the government concurs with Defendant Biggs that consolidated briefing is preferable.

4. The Parties respectfully request that the Court grant this motion to permit Defendant Biggs to supplement the Motion to Reopen and to set the following briefing schedule:

- a. Defendant Biggs supplement to Motion to Reopen to be filed on or before August 24, 2021;
- b. The government's opposition to Defendant Biggs' Motion to Reopen to be filed on or before September 7, 2021.
- c. Defendant Biggs reply (if any) to be filed on or before September 14, 2021.

WHEREFORE, the Parties request that the Court grant the Parties' motion and enter the attached, proposed order.

Respectfully submitted,

CHANNING D. PHILLIPS
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D.C. Bar No. 415793

/s/ Jason McCullough
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[PROPOSED] ORDER

This matter having come before the Court upon the Parties’ Joint Motion to Adjust Deadlines in Connection with Defendant Biggs Motion to Reopen Hearing and for Release from Detention (hereinafter “Motion to Reopen”) (ECF 137), and for good cause shown, the motion is hereby GRANTED, and it is hereby:

ORDERED that Defendant Biggs’ supplement to his Motion to Reopen shall be filed on or before August 24, 2021;

ORDERED that the government’s opposition to Defendant Biggs’ Motion to Reopen shall be filed on or before September 7, 2021; and

ORDERED that Defendant Biggs reply (if any) shall be filed on or before September 14, 2021.

SO ORDERED this _____ day of _____, 2021.

HONORABLE TIMOTHY J. KELLY
United States District Judge