

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
WASHINGTON, D.C.

UNITED STATES OF AMERICA

v.

CRIMINAL CASE NO.  
1:21-CR-00116-DLF

WILLIAM MCCALL CALHOUN, JR.  
*Defendant.*

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**UNOPPOSED MOTION FOR AN EXTENSION OF TIME**  
**TO FILE FINAL PRETRIAL MOTIONS**

COMES NOW, Defendant, William McCall Calhoun, Jr., by and through undersigned counsel, and without opposition of the Assistant United States Attorney, and hereby files this motion for additional time for the filing of *all* additional pretrial motions.

(1)

On February 12, 2021, Defendant was indicted on three counts, alleging obstruction of an official proceeding, unlawful entry into the Capitol, and disruptive conduct in the Capitol. (ECF Doc. #6). The charges stem from the events of January 6, 2021, at the Capital Building, in the District of Columbia.

(2)

On January 12, 2022, the Government filed a superseding indictment, charging Defendant with five counts, and again alleging obstruction of an official proceeding,

unlawful entry into the Capital, disruptive conduct in the Capital, and the additional counts of disorderly and disruptive conduct in a restricted building or grounds, and parading, demonstrating, or picketing in a Capital Building. (ECF Doc. #83).

(3)

Most recently Mr. Calhoun appeared, via Zoom, for a motions hearing on July 11, 2022. At that motions hearing the Court set an extended deadline of August 22, 2022, for all of Defendant's final pretrial motions to be filed.

(4)

The Government received and forward to the Defendant the Parler Subpoena *Duces Tecum* return on Friday, August 12, 2022, and the Facebook Subpoena *Duces Tecum* return on Wednesday, August 17, 2022. Due to the volume of the records, and Defense counsel's current case obligations, Defendant needs additional time to review the authentic records and compare to the Government's previously provided third-party social media screenshots to determine if a Motion in Limine related to the introduction of the Defendant's social media records will be necessary.

(5)

In consideration of the above, counsel requests that the Court extend the filing deadline for *all final* pretrial motions by two weeks, to September 5, 2022. The attorney for the Government does not oppose an extension.

WHEREFORE, Defendant respectfully requests that the Court grant his unopposed motion for extension of time for the filing of additional and final pretrial motions.

Respectfully submitted, this 22nd day of August 2022.

/s/ Jessica N. Sherman-Stoltz  
JESSICA N. SHERMAN-STOLTZ, ESQ.  
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CERTIFICATE OF SERVICE

I hereby CERTIFY that on this the 22nd day of August 2022, a true and correct copy of the foregoing *Unopposed Motion for an Extension of Time to File All Pretrial Motions* 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  
Jessica N. Sherman-Stoltz, Esq.  
Virginia State Bar #90172  
Sherman-Stoltz Law Group, PLLC.