

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)

v.)

DANIEL GOODWYN,)

Defendant.)

Case No. 1:21-cr-00153 (RBW)

**DEFENDANT'S UNOPPOSED MOTION TO REVISE AND EXTEND DATES FOR
FILINGS AS ORDERED IN ECF NO. 119**

Comes now the Defendant, Daniel Goodwyn by and through undersigned counsel, and unopposed by the Government respectfully moves this court pursuant to the local Court rules to extend the dates for the filings required by ECF No. 119. The following supports this request:

I. RELEVANT FACTS:

The Court's Order at ECF No. 119 was entered into the filing system and sent by docket notification to the parties in the late afternoon of April 18, 2024.

The Order requires the Defendant to Show Cause why the Court should not reinstate the computer searches and monitoring for disinformation as was vacated and remanded by the Appellate Court.

The Order directs Mr. Goodwyn to submit his filing on or before April 26, 2024.

The Order directs the Government to file a Response with its position by May 10, 2024.

II. DISCUSSION.

The undersigned is in intensive preparations for a trial that begins in this District's Court in Washington D.C. on April 29, 2024. All Defense preparation work, including review of government Jencks material and exhibits, as well as preparation for cross-examinations and of defense witnesses, along with preparation of anticipated impeachment evidence must be completed

prior to air travel from Florida to D.C. on April 28, 2024. The requirement to prepare a proper show cause filing in this overlapping eight day time window will negatively impact final preparations for the trial that starts on April 29, 2024.

The trial should conclude by May 1, 2024, with travel back to Florida anticipated on May 2-3, 2024. The Defense will concurrently have a requirement to prepare a trial brief in lieu of closing argument during the period after May 1, 2024.

The Defense expects to be able to properly begin work on the show cause filing on May 4, 2024, after arrival back in Florida from Washington D.C.

The Order allowed the government fourteen days to respond by May 10, 2024.

The Government agrees to a revised filing schedule where the Defense files its Show Cause document by May 10, 2024; and the Government files its Response position by May 24, 2024.

III. CONCLUSION

Because of the conflict in the undersigned's schedule for an immovable trial starting on April 29, 2024 with the ordered date to file the Show Cause document by April 26, 2024, and given that the proposed changes to due dates do not prejudice any party for the status conference scheduled for June 4, 2024, the Court should issue the attached proposed order.

WHEREFOR, Mr. Goodwyn requests that for good cause shown and in the interests of justice the Court should issue the proposed order for his filing to be due by May 10, 2024 and the Government's response to be filed by May 24, 2024.

Dated April 19, 2024

Respectfully submitted,

/s/ Carolyn A. Stewart

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CERTIFICATE OF SERVICE

I hereby certify on the 19th day of April 2024, a copy of the foregoing was served upon all parties as forwarded through the Electronic Case Filing (ECF) System.

/s/ Carolyn A. Stewart

Carolyn A. Stewart, Esq.