UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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v.

Case No. 21-cr-003 (RCL)

JACOB CHANSLEY,

Defendant.

UNITED STATES' MOTION TO EXTEND DEADLINE TO FILE

The United States, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this motion to extend the deadline to file its opposition to Jacob Chansley's Motion Under 28 U.S.C. § 2255 to Vacate, Set Aside or Correct the Sentence. ECF No. 117 (hereinafter Def. Motion). On May 3, 2023, the Court ordered the government to respond to the motion by June 2, 2023. See Minute Order May 3, 2023. On June 1, 2023, the government filed a request with this Court to disclose material protected by Federal Rule of Criminal Procedure 6(e) with its response. ECF No. 120. The Court has sought the position of defense counsel, who has requested time to review the issue and respond on Monday, June 5, 2023. Therefore, the government seeks an extension until June 5, 2023 to resolve the issue and file the appropriate response on the public docket at that time. Defense counsel has indicated to government counsel and the Court that he does not oppose an extension of time for the purpose of resolving this issue. Therefore, the government seeks leave of this Court to file its opposition to the Section 2255 motion on Monday, June 5, 2023.

Respectfully submitted,

MATTHEW M. GRAVES UNITED STATES ATTORNEY D.C. Bar No. 481052 BY: _/s/ KIMBERLY L. PASCHALL Assistant United States Attorney National Security Section D.C. Bar No. 1015665 601 D Street, N.W., Washington, D.C. 20530 202-252-2650 Kimberly.Paschall@usdoj.gov