

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.

DEFENDANT'S UNOPPOSED MOTION TO EXTEND REPLY DEADLINE

COMES NOW, Defendant, William McCall Calhoun, Jr., by and through undersigned counsel, and without opposition of the Assistant United States Attorney, and herby files this motion to extend the reply deadline to the Government's response to Defendant's Motion in Limine (ECF Numbers 121 and 124). In support of this motion, Defendant states as follows:

(1)

Defendant filed the above-noted motion on September 5, 2022.

(2)

The Government filed its response on September 26, 2022.

(3)

The Speedy Trial Act has been tolled until the next status conference, currently scheduled for October 12, 2022.

(4)

Counsel for the United States does not oppose the relief requested in this Motion.

(5)

Since receipt of the Government's response on September 26, 2022, counsel for Defendant has not had adequate time to speak with Defendant regarding the reply, nor had adequate time to even write the reply. Additionally, counsel for Defendant has an Appellate Motion to Rehear due on Tuesday, October 4th, and an Appellant's reply brief due on Wednesday, October 5th, both of which have been consuming her non-court time.

(6)

Counsel for Defendant is respectfully requesting an additional seven (7) days to file Defendant's reply to the Government's response to Defendant's motion in limine. This would make the new due date Monday, October 10, 2022. Counsel for Defendant is aware that Monday, October 10th is a Federal holiday, and assures the court that she will be working that day, and the holiday will not impact her ability to timely file the reply.

WHEREFORE, Defendant respectfully requests that the Court grant an extension of time for the filing of his reply to the Government's response to Defendant's Motion in Limine until Monday, October 10, 2022.

Respectfully submitted,
WILLIAM MCCALL CALHOUN
By counsel

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

VIRGINIA STATE BAR NO. 90172
Attorney for William McCall Calhoun, Jr.
Sherman-Stoltz Law Group, PLLC.
P.O. Box 69, Gum Spring, VA 23065
(540) 451-7451; Fax (540) 572-4272
jessica@sslawgroupva.com

CERTIFICATE OF SERVICE

I hereby CERTIFY that on this the 3rd day of September 2022, a true and correct copy of the foregoing *Defendant's Unopposed Motion to Extend Reply Deadline* 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.