

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

UNITED STATES OF AMERICA

:
:
:
:
:
:
:
:
:
:

CR. NO. 21-CR-268 (CJN)

v.

JEFFREY MCKELLOP,

Defendant.

**CONSENT MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT’S MOTION TO COMPEL AND GOVERNMENT’S
MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT’S MOTION
FOR RECONSIDERATION OF PRETRIAL RELEASE**

The United States of America, by and through its attorney, the Acting United States Attorney for the District of Columbia, respectfully requests an extension of time to respond to Defendant Jeffrey McKellop’s second Motion to Compel, ECF No. 123, and his Motion for Reconsideration of Pretrial Release, ECF No. 125. The Government respectfully requests to extend the time for its responses to the Motions until December 8, 2022.

Pursuant to the pretrial scheduling order in this matter, pretrial motions are due on December 8, 2022, with responses due December 22, 2022. ECF No. 115. On November 7, 2022, the Defendant filed the pending Motion to Compel. On November 9, 2022, counsel for the Defendant informed counsel for the government of interest in a plea offer to resolve this case short of trial. Counsel for the Defendant agreed to extend the deadline for the pending Motion in order to engage in discussions regarding a pretrial disposition of this matter. The Government has extended a plea offer and a counteroffer has been made. While the Government is working expeditiously to complete negotiations, the Government requests an extension given the time necessary for plea discussions to take place.

In the time between the filing of this Motion and discussions with counsel regarding this Motion, the Defendant filed a Motion for Reconsideration regarding his pretrial detention, ECF No. 125. The Government had not been informed of counsel's intention to file the Motion for Reconsideration. The Government inquired via email whether counsel would also agree to extend time for the Government's response to that Motion but at the time of filing had received no response. The Government also requests December 8, 2022, as the deadline for its response to the Motion for Reconsideration, ECF No. 125.

WHEREFORE, for the foregoing reasons, which constitute good cause, and any other reasons that this Court deems just and proper, the Government requests that its deadlines to respond to the Defendant's Motion to Compel and Motion for Reconsideration be extended to December 8, 2022.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Mary L. Dohrmann
MARY L. DOHRMANN
Assistant United States Attorney
N.Y. Bar Number 5443874
601 D Street, N.W.
Washington, D.C. 20530
(202) 252-7035
Mary.Dohrmann@usdoj.gov

/s/ Maria Y. Fedor
MARIA Y. FEDOR
Attorney, detailed to the
United States Attorney's Office for the
District of Columbia
D.C. Bar No. 985823
601 D Street, N.W.

Washington, DC 20530
Maria.Fedor@usdoj.gov