

**United States District Court  
District of Columbia**

United States of America,

Plaintiff,

v.

Daniel Rodriguez,

Defendant.

Case No. 1:21-cr-00246-ABJ-1

**UNOPPOSED MOTION FOR EXTENSION TO RESPOND TO  
GOVERNMENT'S MOTIONS IN LIMINE**

The defendant, Daniel Rodriguez, by and through his counsel of record, requests this Court continue the pretrial motion deadlines from January 13, 2023, to January 23, 2023, to allow Mr. Rodriguez sufficient time to consult with counsel prior to the filing of any reponse. Mr. Rodriguez was recently moved to USP Lewisburg, PA, making communication difficult. In addition, on December 16, 2022, the government extended Mr. Rodriguez a plea offer in writing. The acceptance of this plea agreement would obviate the need to respond to the government's pending motions. Mr. Rodriguez's counsel has discussed this request with the government, and they do not object to a continuance.

For the foregoing reasons, Mr. Rodriguez respectfully requests this Court extend the defendant's response date to the government's motions in limine from January 13, 2023 to January 23, 2023.

**Dated:** January 13, 2023

Respectfully submitted,

RENE L. VALLADARES  
Federal Public Defender

By: */s/Rebecca A. Levy*  
*/s/Margaret W. Lambrose*  
*/s/Katherine A. Tanaka*

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REBECCA A. LEVY  
MARGARET W. LAMBROSE  
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Assistant Federal Public Defenders  
Attorneys for Daniel Rodriguez

**Certificate of Electronic Service**

I hereby certify on the 13th day of January 2023 a copy of same was electronically filed using the CM/ECF system and thus delivered to the parties of record and in pursuant to the rules of the Clerk of Court.

*/s/ Cecilia Valencia*

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Employee of the Federal Public  
Defender