

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Criminal No. 21-CR-447 (CJN)</b>
	:	
<b>JOSHUA CHRISTOPHER DOOLIN,</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT MOTION TO EXTEND DEADLINE TO FILE JOINT PRETRIAL STATEMENT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and defendant Joshua Christopher Doolin, by and through his attorney, Allen Orenberg, Esq., respectfully move this Court (1) to extend the deadline for the parties to file their Joint Pretrial Statement from August 22, 2022 until August 29, 2022, and (2) to the extent that the issue is not resolved by the Court's ruling on the parties' motions in limine, to permit the defendant to file a response to the Government's Notice Pursuant to Rule 404(b) by August 29, 2022.

On August 12, 2022, the defendant filed a motion seeking to continue the trial in this matter, currently scheduled for September 12, 2022, until early 2023. (ECF No. 137.) The Government filed its response on August 14, 2022. (ECF No. 144.) On August 15, 2022, the Court ordered the defendant to file his reply by August 19, 2022. The parties therefore respectfully request that the deadline to file their Joint Pretrial Statement be adjourned until after the Court rules on the defendant's continuance motion and until August 29, 2022.

On August 15, 2022, the Government notified the defendant, pursuant to Federal Rule of Criminal Procedure 404(b) of its intent to introduce at trial a January 5, 2021 text message

exchange between Mr. Doolin and his father regarding bringing a firearm and ammunition, referred to as “AR” and “mags,” to Washington, D.C. on January 6, 2021, should the Court find that such evidence is not intrinsic evidence of the offenses with which the defendant is charged. Therefore, to the extent the issue is not resolved by the Court’s ruling on the defendant’s motion in limine (ECF No. 128), defense counsel respectfully requests the Court to permit him to file a response by August 29, 2022. The Government does not object to this request.

Respectfully submitted,

MATTHEW GRAVES  
UNITED STATES ATTORNEY

By: /s/ Benet J. Kearney  
BENET J. KEARNEY  
Assistant United States Attorney, Detailee  
NY Bar No. 4774048  
1 Saint Andrew’s Plaza  
New York, New York 10007  
Benet.Kearney@usdoj.gov  
(212) 637 2260

/s/ Matthew Moeder  
MATTHEW MOEDER  
Assistant United States Attorney, Detailee  
Missouri Bar No. 64036  
400 East 9th Street  
Room 5510  
Kansas City, Missouri 64106  
Matthew.Moeder@usdoj.gov  
(816) 426-4103

CERTIFICATE OF SERVICE

I certify that a copy of the Joint Motion to Extend Deadline to File Joint Pretrial Statement was served on all counsel of record via the Court's electronic filing service.

/s/ Benet J. Kearney  
BENET J. KEARNEY  
Assistant United States Attorney

Date: August 17, 2022