## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERIC	(A)	
	)(	Criminal No. 21-204 (BAH)
v.	)(	Chief Judge Howell
	)(	Trial: August 1, 2022
MATTHEW BLEDOSE	)(	

## UNOPPOSED MOTION TO EXTEND DEADLINES FOR FILING PRETRIAL MOTIONS AND OPPOSITIONS AND REPLIES

COMES NOW the defendant, Matthew Bledsoe, by and through undersigned counsel, and respectfully moves this Honorable Court, to extend the deadline for filing pretrial motions in this case and the deadlines for related oppositions and replies by four weeks. In support of this motion, Mr. Bledsoe would show:

- Currently, pretrial motions are due in this case on April 1, 2022.
   Oppositions to those motions are due on April 22, 2022, and replies to the oppositions are due on April 29, 2022.
- 2. Undersigned counsel has been working hard to get Mr. Bledsoe's pretrial motions in by the April 1, 2022 deadline, and he has recently filed a fairly involved motion to dismiss the count of the indictment charging Mr. Bledsoe with a violation of 18 U.S.C. § 1512(c)(2). See Motion to Dismiss Count One of Indictment for Failure to State an Offense and Points and Authority in Support Thereof (Motion to Dismiss) (ECF #168). Counsel anticipates that he might also file two motions to suppress evidence: one related to the return from a Facebook account allegedly belonging to Mr. Bledsoe, and the other related to data extracted from two cell phones allegedly belonging to Mr.

Bledsoe. However, in order to determine the appropriateness of such motions, counsel needs more time to review the evidence in this case that is being posted to the Deloitte/Relativity database. Accordingly, Mr. Bledsoe is requesting that the Court extend the deadlines for pretrial motions, oppositions, and replies in this case by four weeks.

- 3. Undersigned counsel believes that the Motion to Dismiss that has been filed is critical to this case. The case will be vastly different if the motion is granted. The additional motions that counsel is anticipating filing are not likely to change the complexion of the case significantly.
- 4. If the Court grants this motion to extend deadlines by four weeks, the new deadlines will be: April 29, 2022 for pretrial motions; May 20, 2022 for oppositions; and May 27, 2022 for replies. Currently, the next scheduled court appearance in this case is July 15, 2022. This is for pretrial conference. Trial is scheduled to begin on August 1, 2022. The Motion to Dismiss that has already been filed does not require an evidentiary hearing to resolve. At this point, counsel does not believe that any additional pretrial motions he might file for Mr. Bledsoe will require an evidentiary hearing to resolve.
- 5. On March 31, 2022, undersigned counsel exchanged e-mails with Assistant United States Attorney Jamie Carter. Ms. Carter graciously indicated that the government does not oppose this motion to extended the deadlines for pretrial motions, oppositions, and replies in this case by four weeks.

WHEREFORE, the defendant, Matthew Bledsoe, moves this Honorable Court to extend the deadline for filing pretrial motions in this case and the deadlines for filing related oppositions and replies by four weeks.

Respectfully submitted,

<u>/s/</u>

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