

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-37 (TNM)
	:	
TIMOTHY LOUIS HALE-CASANELLI,	:	
	:	
Defendant.	:	

JOINT MOTION FOR AN EXTENSION OF TIME

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and Jonathan Zucker, Esq., respectfully submit this Joint Motion for an Extension of Time for the United Sates to file its Response to Defendant’s Motion to Modify Bond to Place Defendant on Conditional Release Pending Trial (Docket Entry 13). The bases for this motion are as follows:

1. On March 2, 2021, Defendant filed a motion for release pending trial. (Docket Entries 13, 14). Defendant’s motion includes recommended third-party custodians.
2. On March 4, 2021, the Court ordered the United States to respond to Defendant’s motion by March 8, 2021.
3. On March 5, 2021, the United States received a substantial amount of processed digital evidence from the case agents, including a full Cellebrite extraction of Defendant’s cellular telephone. Much of this evidence is relevant to the Court’s consideration of Defendant’s motion.
4. Undersigned counsel communicated with counsel for the Defendant via telephone on March 7, 2021, and informed him that undersigned counsel would be able to respond to Defendant’s motion according to the Court’s established deadline, but that such response would necessarily include evidence that Defendant has not yet seen.

5. During that telephone call, undersigned counsel and counsel for Defendant agreed that a review of such evidence may affect Defendant's position vis-à-vis the pending motion. Undersigned counsel and counsel for Defendant also agreed that the Court would likely prefer to hear a fulsome and informed discussion of this evidence prior to ruling on any such motion.

6. Undersigned counsel and counsel for Defendant have agreed to communicate in the coming days regarding the provision of discovery and the issue of detention.

WHEREFORE, the parties respectfully request that the Joint Motion for an Extension of time be GRANTED, and that the United States be ordered to respond to Defendant's motion not later than March 12, 2021.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of this pleading to be served upon defense counsel via the Electronic Case Filing (ECF) system, March 7, 2021.

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