UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

UNOPPOSED MOTION TO EXTEND DEADLINE
FOR FILING REPLY TO GOVERNMENT'S REPSONSE
TO DEFENDANT'S MOTION TO DISMISS
COUNT ONE OF THE INDICTMENT

COMES NOW the defendant, Matthew Bledsoe, by and through undersigned counsel, and respectfully moves this Honorable Court, to extend the deadline for filing his reply to the government's response to his motion to dismiss count one of the indictment in this case. Specifically, Mr. Bledsoe requests that the Court extend the deadline from April 29, 2022 to May 9, 2022. In support of this motion, Mr. Bledsoe would show:

1. On March 31, 2022, Mr. Bledsoe filed a Motion to Dismiss Count One of Indictment for Failure to State an Offense and Points and Authority in Support Thereof. (ECF #168). On April 22, 2022, the government filed a Government's Response to Defendant's Motion to Dismiss (Government's Response) (ECF #179).

2. Mr. Bledsoe's reply to the Government's Response is due on April 29, 2022. Any additional pretrial motions by Mr. Bledsoe are also due on April 29, 2022.

3. Undersigned counsel has been working on additional pretrial motions for Mr. Bledsoe, and he intends to file these motions on April 29, 2022. However, due to the time he has put in on these motions and due to the press of business, it does not appear

that counsel will be able to finish his reply to the Government's Response by April 29, 2022. Accordingly, Mr. Bledsoe is requesting that the Court extend the deadline for him to file his reply to the Government's Response to May 9, 2022.

4. Trial in this case is not scheduled until August 1, 2002, and the next court hearing is not until July 15, 2022.

5. On April 29, 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 deadline for Mr. Bledsoe to file his reply to the Government's Response to May 9, 2022.

WHEREFORE, the defendant, Matthew Bledsoe, moves this Honorable Court to extend the deadline for filing his reply to the government's response to his motion to dismiss count one of the indictment from April 29, 2022 to May 9, 2022.

Respectfully submitted,

/s/

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