

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	Case Number 21-MJ-188
RYAN SAMSEL,	:	
	:	
Defendant.	:	

UNOPPOSED MOTION FOR EXTENSION

On Monday, May 24, 2021, defense counsel filed a motion for pretrial release on behalf of Ryan Samsel. (R. 23). Samsel has been detained since January 30, 2021. Defense counsel and the Government have conferred and both are available on the morning of Friday, June 4 at any time before noon for the hearing. The Government requests an extension to June 3, 2021 at 5 p.m. for the filing of its response to the defense motion. The defendant has no objection to this extension.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY

By: /s/ April N. Russo
April N. Russo
Assistant United States Attorney
PA Bar No. 313475
U.S. Attorney's Office
555 4th Street, N.W.
Washington, D.C. 20530
202-252-1717
april.russo@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Consent Motion to Continue was served upon counsel of record through electronic mail, this 27th day of May, 2021.

By: /s/ April N. Russo
April N. Russo
Assistant United States Attorney
PA Bar. Bar 313475
555 4th Street, N.W.
Washington, D.C. 20530
(202) 252-1717
April.russo@usdoj.gov