

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

United States of America,

v.

Jessica Watkins,

Defendant.

Case No. 21-cr-028-3 (APM)

**UNOPPOSED MOTION FOR ADDITIONAL TIME TO FILE MOTIONS**

Jessica Watkins, through counsel, respectfully requests that the Court grant her additional time to file additional motions she may deem necessary. Ms. Watkins has requested leave to join the pending motion to dismiss but may have additional motions to file after completion of the discovery. Therefore, she respectfully requests an extension of time of at least 60 days to file additional motions. Ms. Watkins has no objection to the continued exclusion of time from the Speedy Trial calculation and notes that, at least with respect to her, should her motion to join Mr. Caldwell's motion to dismiss be granted, the Speedy Trial clock is tolled for while that motion is pending. Counsel for the government does not object to this request.

Respectfully submitted,

A.J. KRAMER  
Federal Public Defender

\_\_\_\_\_/s/\_\_\_\_\_  
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