

- co-conspiracy admissibility theory. Counsel needs additional time to assess motions excluding such evidence, and to what extent that category of evidence bears on the question of severance of defendants. For example, the government has provided counsel with many hours of body-cam footage from January 6, 2021, most of which does not involve Mr. James. The same is true of electronic communications. While some of such evidence will surely be admitted at Mr. James' trial, counsel has not had adequate time review it to determine whether its' admission against him could raise a constitutional issue.
4. Counsel needs additional time to research the facts and law related to potential motions to suppress evidence, including motions related to the breadth of government search warrants for electronic data.

For the above-stated reasons, Mr. James respectfully requests that his motion be granted, and that the deadline for the filing of pre-trial motions be extended for a reasonable period to be discussed at the hearing of this motion. Mr. James proposes the setting of a motion's deadline at the time the Court sets a trial date.

Respectfully submitted,

By Counsel

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