

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

UNITED STATES

*

vs.

* Case No.: 21-CR-28-APM

THOMAS E. CALDWELL

*

* * * * *

CONSENT MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS

COMES NOW, the Defendant, Thomas E. Caldwell, by and through his attorney, David W. Fischer, Esq., and respectfully requests that the Court extend the time for filing pretrial motions for 60 days, and in support of said motion states as follows:

1. The Government consents to the present request.
2. At the last Status Hearing, the Court set a deadline of July 1, 2021 for the filing of pretrial motions pursuant to Fed. R. Crim. P. Rule 12(b).
3. Since the last hearing, the Government has continued to produce voluminous discovery, including hundreds of FBI files, videos, social media files, and other materials.
4. A number of the motions to be filed in this case involve complex issues that require challenges that cannot be adequately addressed without review of the additional discovery.
5. The expansion of the conspiracy to include a total of 16 defendants, a number of unnamed individuals, and at least one defendant charged in a separate indictment, who is alleged to be a member of the Oath Keepers, has also increased the time necessary to review discovery.

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

UNITED STATES

*

vs.

* Case No.: 21-CR-28-APM

THOMAS E. CALDWELL

*

* * * * *

ORDER

Upon consideration of the Defendant's Consent Motion to Extend Time to File Pretrial Motions, it is this hereby ORDERED by the United States District Court for the District of Columbia, that the Motion is GRANTED and thus, the Pretrial Motions deadline is extended to September 1, 2021.

Date

Honorable Amit P. Mehta
United States District Court