

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

**UNITED STATES OF AMERICA**

vs.

**JEREMY DANIEL GROSECLOSE**  
**Defendant**

\*  
\*  
\*  
\*  
\*  
\*  
\*

**Case No. 1:21-cr-00311-CRC-1**

**ooOoo**

**CONSENT MOTION TO MODIFY THE BRIEFING SCHEDULE,  
RESCHEDULE STATUS HEARING AND EXCLUDE SPEEDY TRIAL TIME**

Jeremy Groseclose, by his undersigned counsel, hereby respectfully moves this Honorable Court to modify the briefing schedule for filing FED. R. CRIM. PROC. 12(b) pretrial motions, including motions to dismiss to February 7, 2022, with Government’s Response due February 21, 2022, nunc pro tunc. He also respectfully requests that the Court reschedule the Status Hearing to March 7, 2022, or another date thereafter convenient to the Court. He also consents to the exclusion of Speedy Trial time in the interests of justice. AUSA Michael Romano consents to this Request.

1. The Court had previously set January 10, 2021 for the filing of pretrial motions by Mr. Groseclose.
2. Despite due diligence, counsel has been unable to meet that schedule in part due to the press of other matters as well as the continuing production of voluminous discovery, including for example the production of Global Discovery #10 this week.
3. While Rule 12(b) motions do not always require review of discovery, given the complexity and volume of discovery in this case, counsel believes that additional review of discovery before filing the motions is appropriate.

4. In addition, in the past few weeks several judges in this district have issued lengthy opinions that address the issues to be raised in the Rule 12(b) motions that Mr. Groseclose intends to file. Review of those opinions is necessary before Mr. Groseclose may file his motions.

5. The parties request that the Court set a new briefing schedule with Defendant's Motion to be due on February 7, 2022 and the Government's response to be due on February 21, 2022.

6. The parties also request that the Court reschedule the Status Hearing scheduled for January 25, 2022, to March 7, 2022, or another date thereafter convenient to the Court.

7. Counsel has a conflict with the January 25, 2022 date as Judge Mehta scheduled a Status Conference in a case involving more than 20-defendants for the same date and time.<sup>1</sup>

8. Mr. Groseclose consents to the exclusion of Speedy Trial time to and including March 7, 2022 to allow adequate time for counsel to review discovery and prepare pretrial motions.

9. AUSA Michael Romano consents to this request.

---

<sup>1</sup> When counsel alerted Judge Mehta to the scheduling conflict, he requested that I seek to continue the instant matter due to the difficulty of setting a date in a case involving more than 20 defendants.

WHEREFORE, Mr. Groseclose respectfully moves this Honorable Court to (1) extend the time for filing Rule 12(b) motions to February 7, 2022; (2) extend the time for the Government's response to February 21, 2022, and (3) reschedule the February 25, 2022 Status Hearing to March 7, 2022, or another date thereafter convenient to the Court.

Respectfully submitted,

*/s/ Carmen D. Hernandez* \_\_\_\_\_

**Carmen D. Hernandez**

Bar No. MD 03366

7166 Mink Hollow Rd

Highland, MD 20777

240-472-3391

chernan7@aol.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that the instant Motion was served on all counsel of record 21<sup>st</sup> day of January, 2022 on all counsel of record via ECF.

*/s/ Carmen D. Hernandez* \_\_\_\_\_

**Carmen D. Hernandez**