

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 21-CR-223 (APM)
)	
)	
MATTHEW MARK WOOD)	

Unopposed Motion for Extension to file pretrial motions

Kira Anne West, attorney for Matthew Mark Wood , hereby respectfully requests an extension of time to file pretrial motions which are currently due on April 11, 2022 and states the following in support:

1. As discussed in the last status conference, undersigned counsel is set for trial on June 6, 2022, in *USA v. Egtvedt* (CRC). Undersigned counsel has been filing motions in the case and is now working on additional motions due April 25, 2022. This Court entered a briefing schedule on March 11, 2022, which set all deadlines for the case. See ECF No. 24. Specifically, this Court set the filing for motions under FRCrimP 12(b)(3)(A)(D) for April 11, 2022. *Id.*
2. Undersigned counsel has two briefs due in the D.C. Circuit this month: *USA v. Cano-Flores*, 21-3002 due April 15, 2022 and *USA v. Fadi*, 21-3076 due April 25, 2022.
3. Undersigned counsel has a trial April 11, 2022 in Superior Court in *USA v. Deandre King*, 2020 DV 695.
4. Undersigned counsel has a motion to dismiss (the indictment) due April 11, 2022 in *USA v. Davies, et.al* (RBW).
5. With the exception of the Superior Court matter, all of these cases are behemoths. Counsel

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA UNITED STATES OF AMERICA)) v.) CRIMINAL NO. 21-CR-223 (APM))) MATTHEW MARK WOOD) Unopposed Motion for Extension to file pretrial motions Kira Anne West, attorney for Matthew Mark Wood, hereby respectfully requests an extension of the to file pretrial motions which are currently due on April 11, 2022 and states the following in support: 1. As discussed in the last status conference, undersigned counsel is set for trial on June 6, 2022, in USA v. Egtvedt (CRC). Undersigned counsel has been filing motions in the case and is now working on additional motions due April 25, 2022. This Court entered a briefing schedule on March 11, 2022, which set all deadlines for the case. See ECF No. 24. Specifically, this Court set the filing for motions under FRCrimP 12(b)(3) (A)(D) for April 11, 2022. Id. 2. Undersigned counsel has two briefs due in the D.C. Circuit this month: USA v. Cano-Piñeres, 21-3062 due April 15, 2022 and USA v. Fadl, 21-3076 due April 25, 2022. 3. Undersigned counsel has a trial April 11, 2022 in Superior Court in USA v. Deandre King, 2020 DV 695. 4. Undersigned counsel has a motion to dismiss (the indictment) due April 11, 2022 in USA v. Davies, et al (RBW). 5. With the exception of the Superior Court matter, all of these cases are benchmoths. Counsel has other sentencing, status conferences and other cases with work as well in the next 30 days. 6. Undersigned counsel spoke to AUSA Henek on April 4, 2022, who does not oppose an extension of filing pretrial motions until April 27, 2022. Undersigned counsel understands that if this motion is granted, AUSA Henek would also need extensions on his dates. Undersigned counsel has no opposition to those requests by AUSA Henek. All other dates such as jury selection (June 20) and trial (June 27) are good. 7. This motion is not made for delay. Respectfully submitted, KIRA ANNE WEST

By: /s/ Kira Anne West DC Bar No. 993523 712 H Street N.E., Unit #509 Washington, D.C. 20002 Phone: 202-236-2042 kiraannewest@gmail.com

CERTIFICATE OF SERVICE I hereby certify on the 6th day of April, 2022 a copy of same was electronically filed using the CM/ECF system and thus delivered to the parties of record and pursuant to the rules of the Clerk of Court. /S/ Kira Anne West IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA UNITED STATES OF AMERICA)) v.) CRIMINAL NO. 21-CR-233(APM))) MATTHEW MARK WOOD) ORDER Pending before the Court is the unopposed motion of defendant, Matthew Mark Wood, seeking an extension until April 27, 2022 to file pretrial motions in this matter. Finding the motion meritorious and unopposed, it is hereby ORDERED that the filing deadline for pretrial motions is continued until _____, 2022. SO ORDERED this _____ day of April, 2022.

Amit P. Mehta United States District Judge 3
KIRA ANNE WEST

By: _____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify on the 6th day of April, 2022 a copy of same was electronically filed using the CM/ECF system and thus delivered to the parties of record and pursuant to the rules of the Clerk of Court.

_____/S/_____
Kira Anne West

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 21-CR-233(APM)
)
)
 MATTHEW MARK WOOD)

ORDER

Pending before the Court is the unopposed motion of defendant, Matthew Mark Wood, seeking an extension until April 27, 2022 to file pretrial motions in this matter. Finding the motion meritorious and unopposed, it is hereby ORDERED that the filing deadline for pretrial motions is continued until _____, 2022.

SO ORDERED this _____ day of April, 2022.

Amit P. Mehta
United States District Judge