

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

UNITED STATES OF AMERICA

vs.

JEREMY DANIEL GROSECLOSE
Defendant

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

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**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 28, 2022, with Government’s Response due March 14, 2022, nunc pro tunc. He also respectfully requests that the Court reschedule the Status Hearing to a date during the week of March 28, 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 extended the time to February 7, 2022, 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 recent production of Global Discovery #10 and 11.
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 28, 2022 and the Government's response to be due on March 14, 2022.

6. The parties also request that the Court reschedule the Status Hearing scheduled for to March 28, 30, or the afternoon of March 31, 2022, or another date thereafter convenient to the Court.

7. Mr. Groseclose consents to the exclusion of Speedy Trial time to and including March 31, 2022 to allow adequate time for counsel to review discovery and prepare pretrial motions.

8. AUSA Michael Romano consents to this request.

WHEREFORE, Mr. Groseclose respectfully moves this Honorable Court to (1) extend the time for filing Rule 12(b) motions to February 28, 2022; (2) extend the time for the Government's response to March 14, 2022, and (3) reschedule the Status Hearing to March 28. 30 or the afternoon of March 31, 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 17th day of February, 2022 on all counsel of record via ECF.

/s/ Carmen D. Hernandez _____

Carmen D. Hernandez