

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
CRIM. NO. 21-00189 (CJN)

UNITED STATES OF AMERICA,
Plaintiff,

v.

RICHARD L. HARRIS,
Defendant.

**DEFENDANT’S UNOPPOSED MOTION FOR
EXTENSION OF MOTION DEADLINE**

The Defendant, Richard Harris, through undersigned counsel, moves this Court to extend the previously imposed motion deadline in this matter for seven (7) days, and states that:

In its Scheduling Order dated April 21, 2022, (DE 29), the Court set a deadline of June 17, 2022 for the filing of “any motions to dismiss the indictment or other motions to exclude evidence[.]” Since then, the parties have engaged in discussions that might result in Mr. Harris pleading guilty. If they are successful, no pretrial motions would of course need to be filed. The Defendant anticipated that a resolution would be reached well before the present motions deadline. Because of unavoidable delays, however, undersigned counsel now requests an additional seven (7) days to file all appropriate motions on Mr. Harris’s behalf should it be necessary to do so.

Assistant United States Attorney Jason Manning has represented that the government does not oppose the requested relief.

WHEREFORE, the Defendant requests a seven (7) day extension to file his pretrial motions.

Respectfully submitted,

MICHAEL CARUSO
Federal Public Defender

s/ Eric Cohen
Eric Cohen
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 15, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day of all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/Eric M. Cohen
Eric Cohen