

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case No. 21-CR-108 (TSC)
	:	
v.	:	
	:	
MICHAEL JOSEPH FOY,	:	
	:	
Defendant.	:	

**UNOPPOSED GOVERNMENT'S MOTION TO EXTEND TIME TO FILE ITS  
OPPOSITION TO DEFENDANT'S MOTION FOR BILL OF PARTICULARS**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this unopposed motion to extend time to file its opposition to defendant's motion for bill of particulars. In support of its motion, the United States relies on the following points and authorities and any other such points and authorities as may be raised at any hearing on this matter:

- 1) On May 13, 2021, the defendant filed its Motion for Bill of Particulars in the above-captioned matter. *See*, Defendant's Motion For Bill of Particulars ECF# 29.
- 2) Consistent with this Court's Local Rules -LCvR 7, the government would have 14 days to respond to the defendant's motion, bringing the government opposition due on or before May 27, 2021.
- 3) Because of the government's heavy caseload and the fact that undersigned counsel for the government had previously scheduled to be out of the jurisdiction from May 22 - 28, 2021, the government is requesting that its opposition be due on or before Friday June 4, 2021.
- 4) In that regard, undersigned counsel for the government has contacted counsel for the defendant, Eugene Ohm, Esq., and confirmed that he **does not** oppose the government's request.

**CONCLUSION**

WHEREFORE, for all of the foregoing reasons stated in the government's motion, the United States respectfully requests that the Court extend time to file its opposition to defendant's Motion for Bill of Particulars until on or before June 4, 2021, be GRANTED.

Respectfully submitted,

CHANNING D. PHILLIPS  
ACTING UNITED STATES ATTORNEY  
D.C. Bar No. 415793

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**PROPOSED ORDER**

Upon consideration of the Unopposed Government's Motion to Extend Time for the Filing of the Government's Opposition to Defendant's Motion for Bill of Particulars, it is hereby:

**ORDERED** that the Unopposed Government's Motion to Extend Time for the Filing of the Government's Opposition to Defendant's Motion for Bill of Particulars is **GRANTED**, and

**FURTHER ORDERED** that the Government may file its opposition on or before June 4, 2021.

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TANYA S. CHUTKAN  
JUDGE, UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

SIGNED this \_\_\_\_ day of May 2021