

**In The United States District Court  
For The District of Columbia District**

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UNITED STATES OF AMERICA,

Criminal 21-CR-53 (CJN)

- against -

**NOTICE OF  
APPEARANCE**

**EDWARD JACOB LANG,**  
Defendant.

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**DEFENDANT’S UNOPPOSED MOTION FOR ENLARGEMENT OF  
TIME TO RESPOND TO GOVERNMENT’S OPPOSITION TO  
DEFENDANT’S REQUEST FOR BOND**

The Defendant hereby respectfully moves the Court for a 3-day enlargement of time within which to respond to the Government’s opposition to Defendant’s application for bond. If the instant motion is granted, the defendant’s response would be due on September 17, 2021. The defense conferred with counsel for the government, who stated that the government is unopposed to this motion.

In support of this motion, the defense states the following:

1. On September 7, 2021, the Government filed their Opposition to Defendant’s motion for Release a 36-page opposition along with several exhibits. As of this filing, the defendant has not filed a motion for an extension of time to file a

reply. Undersigned counsel was just able to gain access to the exhibits while working with counsel for the Government.

2. Given the length of the defendant's motion and the government's response with the number of issues they have raised, the defense needs a few additional days to file their response. In seeking this relief, the defense proposes that the Court provide an extension of 3-days week—that is, until September 17, 2021—for the defendant to file any reply in support of his motion for bond.

3. The defense submits that the requested relief would not adversely affect the pace of litigation in this case, in which discovery is ongoing and a bond hearing is not scheduled till next week and the Court has not yet set deadlines for dispositive motions.

4. Furthermore, counsel for the Defendant, has significant other deadlines, technical issues with computers and the scanner/copier in the office<sup>1</sup>, and other issues that necessitate the brief request for an extension of time.

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<sup>1</sup> Metcalf and Metcalf, recently moved from the 25<sup>th</sup> floor to the 6<sup>th</sup> floor at the same address. In addition to the move, we obtained new internet service, a new copier/scanner, all of which has caused us some delays in our work.

**WHEREFORE**, the defense requests that the Court grant the government's motion and enter the attached, proposed order.

Dated: New York, New York  
September 14, 2021

Respectfully Submitted,



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MARTIN H. TANKLEFF, ESQ.

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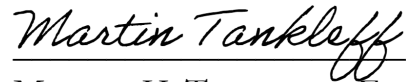
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## CERTIFICATE OF SERVICE

We hereby certify that, on September 14, 2021, the forgoing document was filed via the Court's electronic filing system, and sent to the AUSA via email, which constitutes service upon all counsel of record.

Respectfully Submitted,



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