

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,
Vs.

CASE NO.: 1:21-CR-00524-CKK-1

NICHOLAS BROCKHOFF,
Defendant.

_____/

**MOTION FOR EXTENSION OF TIME TO FILE NICHOLAS BROCKHOFF'S
RESPONSE TO THE GOVERNMENT'S RESPONSE TO NICHOLAS
BROCKHOFF'S MOTION TO SET BOND**

COMES NOW, the Defendant, NICHOLAS BROCKHOFF, by and through the undersigned counsel, and hereby files this his Motion for Extension of Time to File Nicholas Brockhoff's Response to the Government's Response to Nicholas Brockhoff's Motion to Set Bond, and states as follows:

1. That the Defendant filed his motion for conditions of release.
2. The Court granted the Government until February 18, 2022m to file their response.
3. That the Defendant's response to the Government's response is due on February 23, 2022.
4. The Government's response addressed new issues and evidence relevant to any hearing on the Motion for Bond, but also going forward in regard to plea negotiations.
5. The Defendant is being detained in the Northern Neck Regional Jail.
6. The undersigned visits with the Defendant via online portals.
7. The undersigned had a visit scheduled, and due to technical difficulties the visit did not occur.

8. The undersigned, therefore, did not get to address any of the matters in the Government's Response with the Defendant.

9. The undersigned seeks an extension to file his response and respectfully, requests a ten day extension.

10. Said request is not meant to be unduly burdensome or to cause delay.

11. The time requested allows the proper time to speak to the defendant, and allow the undersigned to prepare a response.

12. The undersigned spoke to Assistant United States Attorney Jacqueline Schesnol, and she has no objection to the extension.

WHEREFORE, the undersigned requests this Honorable Court grant the extension requested in this cause and grant any and all other relief deemed equitable and fair.

ALEX R. STAVROU, ESQ.

ALEX R. STAVROU, ESQUIRE

Certificate of Service

I HEREBY CERTIFY, that a true and correct copy of the foregoing Notice of Appearance was sent via ECM filing to the United States Attorney Office for the District of Columbia on this 23rd day of February, 2022.

ALEX R. STAVROU, ESQ.

Alex R. Stavrou, Esquire

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