

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	CASE NO. 1:21-CR-00513 RBW
v.	:	
	:	
WILLIAM WATSON	:	
	:	
Defendant.	:	

**UNITED STATES' UNOPPOSED MOTION TO EXTEND PRETRIAL DEADLINES**

The United States hereby moves this Court for an extension of time for the parties to file their respective pretrial motions, notices, and filings, and in support of its motion states:

1. Trial of this matter is set for November 14, 2022. July 25, 2022, Minute Entry.
2. In preparation for trial, this Court entered a Pretrial Scheduling Order. ECF No. 34. Pursuant to the order, motions in limine and Rule 404(b) notices and/or evidence of prior convictions for impeachment purposes are due on September 12, 2022. *Id.* Responses to motions in limine and objections to Rule 404(b) notices and/or evidence of prior crimes are due on September 26, 2022. *Id.* Finally, joint proposed voir dire questions, jury instructions, and verdict forms are also due on or before September 26, 2022. *Id.*
3. The parties are currently engaged in serious plea negotiations and believe that a resolution, short of a jury trial, is highly possible. Given the probability of a resolution, the parties further believe that judicial and party resources will be better served by focusing on the negotiations with an eye towards a likely resolution.
4. In light of negotiations and the serious potential for resolution, the parties are requesting the following pretrial deadlines be briefly extended as follows:

September 21, 2022: Motions in limine, Rule 404(b) notices and/or evidence of prior convictions;

October 3, 2022: Responses and objections to motions in limine, Rule 404(b) notices, and evidence of prior convictions; joint proposed voir dire questions, jury instructions, and verdict forms.

5. Counsel for the Defendant Watson has been contacted and they do not oppose the relief requested in this motion.

WHEREFORE, the United States respectfully requests that the Court grant extensions of the pretrial deadlines as requested.

Respectfully submitted,

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