

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

vs.

JEREMY DANIEL GROSECLOSE
Defendant

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Case No. 1:21-cr-00311-CRC-1

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**CONSENT MOTION TO MODIFY THE BRIEFING SCHEDULE FOR
FILING MOTIONS TO DISMISS UNDER RULE 12(b)**

Jeremy Groseclose, by his undersigned counsel, hereby respectfully moves this Honorable Court to modify the briefing schedule for filing FED. R. CRIM. PROC. 12(b) pretrial motions. AUSA Michael Romano consents to this request.

1. On April 1, 2022, Mr. Groseclose filed a Motion to Dismiss Count One (ECF 36); and a Motion to Dismiss Count Two (ECF 37). The motions were filed beyond the March 22, 2022 deadline set by the Court in the Pretrial Order (ECF 34). Despite due diligence, counsel for Mr. Groseclose was unable to file the motions by the due date due to the press of other matters as well as the complexity of the issues.

2. Oppositions and replies to the Rule 12(b) motions were ordered filed “within 14 and 7 days, respectively.” (ECF 34).

3. AUSA Romano, who has been in trial, requests an extension to April 28, 2022 (4-weeks after the filing of the motions to dismiss) for filing a response. Counsel for Mr. Groseclose consents to this request.

4. Mr. Groseclose would file his reply 7 days thereafter on May 5, 2022.

5. The other deadlines established by the Court will not be affected by these modifications to the schedule set by the Court.

WHEREFORE, Mr. Groseclose respectfully moves this Honorable Court to (1) extend the time for filing Rule 12(b) motions, nunc pro tunc, to April 1, 2022; (2) extend the time for the Government's response to April 28, 2022; and (3) extend the time for filing any replies to May 5, 2022.

Respectfully submitted,

/s/ Carmen D. Hernandez

Carmen D. Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that the instant Motion was served on all counsel of record 14th day of April, 2022 on all counsel of record via ECF.

/s/ Carmen D. Hernandez

Carmen D. Hernandez