UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : Criminal No. 21-cr-157

v. :

Judge Trevor McFadden

CHRISTIAN SECOR, :

Defendant : Motions Deadline April 18, 2022

:

CONSENT MOTION TO EXTEND MOTIONS AND EXPERT NOTICE DEADLINES

Mr. Christian Secor by and through counsel respectfully requests that this Court extend the motions and expert notice deadlines.

In support of the motion, counsel states the following:

- On January 14, 2022, Mr. Secor appeared for a status hearing. At that time, the Court tolled the time between the status hearing and the motions deadline pursuant to Speedy Trial Act, until April 18, 2022.
- 2. However, the parties are continuing negotiations, and would jointly request an extension of the motions and expert notice deadlines.
- The parties propose May 2, 2022, for motions and expert notice, May 16, 2022, for responses, and May 23, 2022, for replies. All other related deadlines will remain in place.
- Mr. Secor respectfully requests that the time between April 18, 2022, and May 2,
 2022, be excluded pursuant to the Speedy Trial Act.

Respectfully submitted,

/s/ Brandi Harden
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CERTIFICATE OF SERVICE

I hereby certify that the above Consent Motion to Extend Motions and Expert Notice

Deadlines was served upon all parties by electronic means via the Court's ECF system.

<u>/s/ Brandi Harden</u> Brandi Harden