

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

ELIAS COSTIANES,

Defendant.

Case No.: 1:21-cr-00180-RJL-1

**MOTION FOR LEAVE TO FILE OUT
OF TIME**

COMES NOW, Joseph R. Conte, counsel for Elias Costianes, to respectfully request leave of this honorable court to file, out of time the defendant's Amended Motion to Suppress Statements. As grounds for this motion counsel would state.

1. Suppression motions were due on October 14, 2021.

2. Counsel filed the defendant's motion to suppress statements on October 14, 2021.

3. Subsequent to filing the defendant's motion to suppress statements counsel discovered a third custodial statement by the defendant in the discovery provided by the government in the defendant's pending case in the District of Maryland. Case Number 1:21-cr-00458-JKB-1.

4. That statement references the instant case.

WHEREFORE counsel respectfully request that this motion be granted.

Respectfully submitted,

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