

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 v. : CASE NO. 21-077  
 :  
 MELODY STEELE-SMITH :  
 :  
 Defendant. :

**UNITED STATES' UNOPPOSED MOTION TO FOR EXTENSION OF TIME  
TO RESPOND TO DEFENDANT'S MOTION FOR BILL OF PARTICULARS**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully requests an extension of time to respond to Defendant Melody Steele-Smith's ("the defendant's") Motion for Bill of Particulars ("the motion") (ECF No. 30). The response is currently due on May 20, 2022. The government respectfully requests that this Court grant it until June 3, 2022, to respond to the motion. In support of its request, the government states that undersigned counsel has a voluminous workload which requires additional time to appropriately address the motion. AUSA Reed is preparing for an upcoming trial in *U.S. v. Seefried, et al.*, Case No. 21-CR-000287-TNM. The undersigned has conferred with counsel for the defendant, Elizabeth Mullins, who does not oppose this motion and likewise requests an extension of the Defendant's deadline to reply until June 10, 2022. Moreover, a hearing on this motion is scheduled for July 22, 2022; granting this motion will still provide the defense and this Court with ample time to review the government's opposition prior to the hearing. Accordingly, granting this motion will not unduly prejudice the defendant.

WHEREFORE, for the foregoing reasons, which constitute good cause, and any other reasons that this Court deems just and proper, the government requests that its deadline to respond

to the Defendant's Motion for Bill of Particulars be extended to June 3, 2022, and that Defendant's deadline to reply be extended to June 10, 2022.

Respectfully submitted,

MATTHEW M. GRAVES  
UNITED STATES ATTORNEY  
D.C. Bar No. 481052

By: /s/ Brittany L. Reed  
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**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of the foregoing and the attached proposed order to be served on counsel of record for the defendant by filing via the Court's electronic filing system on this 20<sup>th</sup> day of May, 2022.

By: /s/ Brittany L. Reed  
BRITTANY L. REED  
Assistant United States Attorney