IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

| UNITED STATES OF AMERICA |))) | |
|--------------------------|-------------|----------------------------|
| v. |) | Case No. 1:21-cr-00622-APM |
| MITCHELL TODD GARDNER II |) | |
| |) | |
| |) | |
| |) | |

CONSENT MOTION TO EXTEND THE PRETRIAL ORDER'S JUNE 17 FILING DEADLINES

Defendant Mitchell Gardner, by and through undersigned counsel, respectfully moves this Court to extend the Pretrial Order's (ECF 37) June 17 filing deadlines to June 24, 2022. In support of this motion, counsel states:

- 1. On May 13, 2022, the Court issued a Pretrial Order requiring that by June 17, 2022 1) the United States identify the evidence it will seek to introduce under Federal Rule of Evidence 404(b); and 2) the Defendant satisfy his reciprocal discovery obligations under Rule 16(b).
- 2. The parties have renewed plea negotiations which are likely to result in a resolution of this matter without trial. As such, the parties request additional time to satisfy the June 17 requirements of the Pretrial Order as they may be mooted if the parties reach a resolution.

WHEREFORE, counsel respectfully requests this Court extend the Pretrial Order's June 17 filing deadlines to June 24, 2022.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of June 2022, a true copy of the foregoing Motion was served via the CM/ECF system upon all parties in this matter.

| s/ | |
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| David Benowitz | |