

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

UNITED STATES OF AMERICA :
 :
 v. : **CRIMINAL NO. 21cr0006 (TJK)**
 :
DOUGLAS AUSTIN JENSEN, :
 Defendant. :

MOTION TO RESERVE THE RIGHT TO FILE ADDITIONAL MOTIONS

Douglas Jensen, by his undersigned counsel, hereby respectfully files this motion to reserve the right to file additional motions. He submits the following in support thereof.

1. The defendant is in custody and in transit back to the District of Columbia. Undersigned has no means of communication with Mr. Jensen until he is returned to the District.

2. Speedy trial has been repeatedly tolled pending completion of discovery and plea negotiations. The last extensive disclosure of discovery was made a week ago. At that time, a plea offer was also extended. Mr. Jensen has not had an opportunity to review or discuss any of these matters with counsel.

3. No motion filing schedule has been set pending the resolution of the matters referenced in the preceding paragraphs.

4. The defendant has filed a Motion to Dismiss Count Two of his indictment. See, Dkt. 42. The subject of that motion is the propriety of utilizing 18 U.S.C. §1512(c)(2) as a charge in the prosecution of the events that occurred at

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ORDER

Upon consideration of the Motion to Reserve the Right to File Additional Motions filed by Douglas A. Jensen, good cause having been shown, it is this _____ day of _____, 2021, hereby

ORDERED that the Motion is **GRANTED**.

The Honorable Timothy J. Kelly