

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

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Case No.: 1:21-CR-247-TFH**

**BRADLEY WAYNE WEEKS,**

**Defendants.**

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**SECOND UNOPPOSED MOTION TO EXTEND MOTIONS AND  
CORRESPONDING DEADLINES**

Defendant, Bradley Wayne Weeks, by and through undersigned counsel and pursuant to Fed.R.Cim.P. 45(b) hereby moves this Honorable Court for its Order further extending the motions, oppositions and replies deadline in this case for four (4) days, making any motions due Friday, June 17, 2022, with corresponding extensions of the deadlines for oppositions and replies. In support thereof, Defendant states:

1. The Court previously extended the motions deadline in this case to June 13, 2022, with a deadline for oppositions June 27, 2022 and a deadline for replies due July 5, 2022. (Dkt. 39)

2. Undersigned counsel has been diligently working on a motion to dismiss Count One of the Indictment, however, other responsibilities have interfered with his completion of the motion. In addition to additional

responsibilities undersigned counsel has had to assume following his partner's recent passing, undersigned counsel's youngest son was passenger in a vehicle that was in an automobile accident this past Friday evening. While the child appears to be doing fine at this time, undersigned counsel had to spend time caring for his children this past weekend and was unable to complete the preparation of the motion as he had hoped to do.

3. Fed.R.Cim.P. 45(b)(1)(A) provides: "When an act must or may be done within a specified period, the court on its own may extend the time, or for good cause may do so on a party's motion made: before the originally prescribed or previously extended time expires...."

4. Undersigned counsel has conferred with Assistant United States Attorney Jamie Carter and Anne Veldhuis and is authorized to represent that the Government does not oppose the relief requested herein.

WHEREFORE, Defendant respectfully requests this Honorable Court extend the motion deadline in this cause for a period of four (4) days, making motions due on or before June 17, 2022, oppositions due July 1, 2022 and replies due July 11, 2022.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Matt R. Kachergus", is written over a horizontal line.

Elizabeth L. White, Esquire

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Matthew R. Kachergus, Esquire

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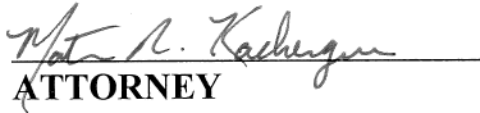
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COUNSEL FOR DEFENDANT

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on June 13, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

**Jamie Carter, Assistant U.S. Attorney  
Anne Veldhuis, Assistant U.S. Attorney  
U.S. Attorney's Office for the District of Columbia  
555 Fourth Street, NW  
Washington, DC 20530**

  
**ATTORNEY**