

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

UNITED STATES OF AMERICA,

v.

Case No. 1:21-cr-175-TJK

JOSEPH BIGGS, et al.,

Defendants.

**DEFENDANT BIGGS' MOTION FOR EXTENTION OF TIME OF 3 DAYS
TO COMPLY WITH ORDER RE: SONENBERG CONFLICTS REPORT**

Defendant Joseph Biggs moves for an extension of time of three (3) days -- or from September 22 until Sunday, September 25 -- to comply with the Court's September 15, 2022 order to submit further proposed redactions to the *ex parte* Sonenberg report and recommendation filed under seal at ECF 459. Submitted on September 12, the Sonenberg report (ECF 459) addresses a possible conflict-of-interest issue fairly raised by the government and undersigned counsel alike concerning undersigned counsel's representation of Joseph Biggs and later his now co-defendant Henry Tarrío in different legislative and legal proceedings arising from the January 6, 2021 events on Capitol Hill.

Despite the Court's order six days ago to release this report, and Mr. Hull's best efforts to obtain it, ECF 459 was not released by the Clerk's office electronically or by U.S. mail to the Biggs defense group as of noon today. At about 1:00 PM today, Mr. Hull finally obtained the Sonenberg report at the U.S. Courthouse on Constitution Avenue by going there and asking for it in person. It is 49 pages long. Due to the detail, admirable complexity and length of ECF 459, and the press of other work, more time is required to review ECF 459 and submit any appropriate redactions of confidential, privileged, personal or private information.

Therefore, and for good cause shown, defendant Joseph Biggs and his counsel ask for an

additional three (3) days or until Sunday, September 25 to comply with the Court's minute order of September 15, 2022.

Respectfully submitted,

COUNSEL FOR JOSEPH RANDALL BIGGS

Dated: September 21, 2022

By: /s/ J. Daniel Hull
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CERTIFICATE OF SERVICE

The undersigned certifies that on September 21, 2022, he served a true and correct copy of the foregoing defendant Biggs' Motion for an Extension of Time of 3 Days to Comply with Order Re: Sonenberg Conflicts Report upon all counsel of record via the Electronic Case Filing (ECF) system.

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