

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES of AMERICA	:	
	:	
Plaintiff	:	
	:	Criminal Case No.: 21-CR-00127
v.	:	
	:	
JOSHUA MATTHEW BLACK	:	
	:	
Defendant	:	

.....

**DEFENDANT’S UNOPPOSED MOTION
TO EXTEND TIME WITHIN WHICH TO FILE PRETRIAL MOTIONS**

The Defendant, **JOSHUA MATTHEW BLACK**, by and through his attorney, Clark U. Fleckinger II, moves this Honorable Court, without opposition, to extend the time within which to file pretrial motions to April 27, 2022. As grounds therefore, Mr. Black represents as follows:

1. That, pursuant to the Court’s March 18, 2022 Order, pretrial defense motions required pursuant to Fed.R.Crim.P. 12 were to be filed on or before April 22, 2022.
2. That, due to unanticipated other professional matters of undersigned counsel since March 18, as well as health issues and a death in the family of undersigned counsel, counsel was unable to sufficiently research, prepare and file such motions.¹
3. That, undersigned counsel anticipates that he will be able to prepare and file the contemplated defense pretrial motions by April 27, 2022.

¹ At the time of the preparation and filing of the instant Defendant’s Unopposed Motion To Extend Time Within Which to File Pretrial Motions, the only Rule 12 motion that counsel for Mr. Black currently anticipates filing is a motion to dismiss that Count of the indictment charging Mr. Black with a violation of 18 U.S.C. § 1512 (Obstruction of an Official Proceeding).

4. That, although assigned AUSA Seth Adam Meinero was unavailable to advise as to the Government's position regarding the requested extension, AUSA Ray Hulser advised that the Government has no opposition to the request made herein.²

5. That, Mr. Black submits that neither the Government nor the efficient administration of justice will be prejudiced by granting the request made herein.

WHEREFORE, the Defendant respectfully requests that the Court extend the time within which to file his pretrial motions to April 27, 2022.

Respectfully submitted,

_____/S/_____
Clark U. Fleckinger II
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Bar No. 362393

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Defendant's Unopposed Motion to Extend Time Within Which to File Pretrial Motions has been served, by ECF, upon AUSA Seth Adam Meinero, at the United States Attorney's Office, located at 555 4th Street, NW, Washington, D.C. 20530, this 22nd day of April, 2022.

_____/S/_____
Clark U. Fleckinger II

² Mr. Meinero's voice mail greeting directed those having immediate need for assistance to contact Mr. Hulser.