

**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,

Defendant.

**FOURTH 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 Monday, June 27, 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 23, 2022, with a deadline for oppositions July 7, 2022 and a deadline for replies due July 25, 2022.
2. With much regret, undersigned counsel is seeking one last extension of time to file motions in this case. 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 had a hearing on a motion for preliminary injunction this past Tuesday, June 21, 2022 in Tallahassee, Florida in the matter of *Falls, et al. v. DeSantis, et al.*, Case No.: 4:22-cv-00166-MW-MJF, seeking to enjoin enforcement of recent legislation restricting teachers' and employers' ability to discuss matters pertaining to race, sex and other topics with their students and employees, referred to by Governor DeSantis as the "Stop WOKE Act." Such matter was heard commencing at 9 a.m. and continuing until 3:00 p.m. in the afternoon. Due to its location, counsel travelled three hours each way to the hearing and, by necessity, spent the entirety of June 20th travelling to that city and preparing for the hearing.

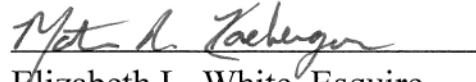
3. Upon counsel's return, he was then required to navigate a client's release to the psychiatric hospital, which did not occur in counsel's absence, and which consumed the better of his day June 22. Since resolution of that matter, counsel has spent his time exclusively working on the motions which will be filed in this case. Despite those efforts counsel needs some additional time to complete the preparation of motions. Counsel is seeking one final indulgence from this Court to extend the time to file the motions in this case for a period of four (4) days.

4. 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....”

5. Undersigned counsel has conferred with Assistant United States Attorney Jamie Carter and is authorized to represent that the Government defers to the Court regarding the relief requested in this motion.

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 27, 2022, oppositions due July 11, 2022 and replies due July 29, 2022.

Respectfully submitted,

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

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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 23, 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
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ATTORNEY