

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

NOAH BACON,  
Defendant.

Case No.: 1:22-cr-00488 CRC-1

UNOPPOSED MOTION FOR LEAVE  
TO FILE OUT OF TIME

COMES NOW, Noah Bacon, through counsel, Joseph R. Conte, to respectfully request leave of this honorable court to file the attached defendant’s Defendant Noah Bacon’s Motion For Transfer Of The Case To Southern District Of Massachusetts and defendant’s Motion to Dismiss Multiplicitous Counts out of time. As grounds for this motion counsel would state:

1. Motions in this matter were due July 27, 2022.
2. Counsel has recently identified the possible multiplicity issue.
3. Counsel had elected not to file a motion for change of venue based on the number of district judges who were denying the motions. However, counsel has elected to file the motion to preserve the issue in the event of a favorable ruling from the Circuit Court.
4. Trial in this matter is not scheduled until February 27, 2023.
5. The United States does not oppose this motion.

WHEREFORE counsel respectfully requests that the court to grant the motion.

Dated: October 31, 2022

Respectfully submitted,

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Joseph R. Conte, Bar #366827  
Counsel for Noah Bacon  
Law Office of J.R. Conte  
8251 NW 15<sup>th</sup> Ct.  
Coral Springs, FL 33071  
Phone: 202.236.1147  
E-mail: dcgunlaw@gmail.com