

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

RICHARD BARNETT,

Defendant.

Case No. 21-cr-0038 (CRC)

**MOTION TO EXTEND PRETRIAL MOTION DATES AND FOR UNENCUMBERED
ACCESS TO DISCOVERY**

Richard Barnett, through his attorney, Joseph D. McBride, Esq., respectfully requests that this Honorable Court modify the February 2, 2022, PRE-TRIAL ORDER. (*See* ECF No. 49) Specifically, Mr. Barnett asks this Court to extend the due dates for the SUPPRESSION and PRETRIAL MOTIONS by forty-five (45) days, and to grant Mr. Barnett unencumbered access to his discovery going forward.

As this Court is aware, discovery is voluminous and ongoing in Mr. Barnett's case. Thousands of files are indiscriminately dumped each time there is a discovery update. In order to help defendants and their attorneys navigate this process, the discovery files themselves were transitioned to the Relativity and Evidence.com databases, which allow a properly trained and licensed user to search through the discovery in an intelligent way.

Mr. Barnett, however, is currently prohibited from accessing his discovery on these databases. Additionally, undersigned counsel and his investigators were only recently granted database licenses and have not yet received the training needed to use them in a meaningful way.

Consequentially, Mr. Barnett is, as of this date, unable to reliably predict any motions to be filed prior to his trial.

Therefore, and for the reasons stated above, Mr. Barnett respectfully asks this Court to grant him licenses for both the Relativity and Evidence.com databases, which will allow him to participate in his defense in a way that is consistent with the protections of the Sixth Amendment to the United States Constitution. Mr. Barnett also asks this Court to extend the due dates for his SUPPRESSION and PRETRIAL MOTIONS by forty-five (45) days, so that he can have a reasonable opportunity to parse through the totality of the available discovery via the Relativity and Evidence.com databases.

Dated: March 18, 2022

Respectfully Submitted,

/s/ **Joseph D. McBride, Esq.**

Joseph D. McBride, Esq.
Bar ID: NY0403
THE MCBRIDE LAW FIRM, PLLC
Attorneys for Richard Barnett
99 Park Avenue, 6th Floor
New York, NY 10016
Phone: (917) 757-9537
Email: jmcbride@mcbridelawnyc.com