

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES

v.

QUAGLIN

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Case No. 1:21-cr-40

DEFENDANT QUAGLIN'S REQUEST FOR AN EXTENSION TO FILE A BREIF IN
REPLY TO THE GOVERNMENT'S RESPONSE TO DEFENDANT'S SECOND
SUPPLEMENT TO DEFENDANT'S SECOND MOTION FOR PRE-TRIAL RELEASE

Defendant Chirstopher Quaglin, by and through his attorneys, hereby requests that the Court grant a two-week extension to file a Brief in Reply to the Government's Response to Defendant's Second Supplement to Defendant's Second Motion for Pre-Trial Release.

Mr. Quaglin's attorneys were occupied with a trial for another defendant from January 9 through January 23 and did not have sufficient time to speak with Mr. Quaglin. Mr. Quaglin is currently being held in solitary confinement in Rappahannock Jail, not due to his behavior, but due to the default policies of the Jail. He and the other inmates are locked down for eighteen to twenty hours a day and he does not have access to a phone for calls with his attorneys that are not monitored or recorded. Because of trial, Mr. Quaglin's attorneys have not had a chance to visit him or to arrange a secure phone call with him to gather the facts necessary to reply to the Government's Response.

Granting the extension would be fair and equitable, the Court on its own and without a request from the Government issued an order providing the Government 25 days to respond to Mr. Quaglin's one-page Supplement filed on December 23, 2022.

For the foregoing reasons, Defendant Quaglin respectfully requests that the Court grant an extension until February 8, 2023 to file a brief in reply to the Government' response.

Dated: January 24, 2023

Respectfully submitted,

/s/ Jonathan Gross

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being served on opposing counsel via email on

January 24, 2023

/s/ Jonathan Gross