

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-cr-203 (JDB)
v.	:	
	:	
ALEXANDER SHEPPARD,	:	
	:	
Defendant.	:	

**SECOND UNOPPOSED MOTION TO EXTEND TIME IN WHICH TO RESPOND TO
DEFENDANT’S MOTION TO COMPEL**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully moves the Court to extend by one additional week the time in which to file its response to the defendant’s motion to compel discovery. *See* ECF 39 (defendant’s motion to compel), ECF 44 (government’s unopposed motion for extension of time to respond to defendant’s motion to compel), 11/14/2022 Minute Order (granting government’s unopposed motion for extension of time to respond to defendant’s motion to compel).

Pursuant to this court’s minute order issued on November 14, 2022, responses to the defendant’s motion to compel are currently due on November 22, 2022, and replies are due on November 29, 2022. The United States remains in the process of reviewing and evaluating the defendant’s requests for discovery, and even with the exercise of reasonable due diligence, additional time is necessary in which to prepare a response. The defendant’s motion to compel requests information relevant to other individuals including (1) “information pertaining to the investigation of the Secret Service after the Department of Homeland Security learned of the deletion of messages before and after January 6, 2021,” (2) “[a]ny Secret Service and/or Capitol Police communications . . . pertaining to the events on January 6, 2021,” and (3) “[a]ny communications between former President Trump’s former staff on the day of January 6, 2021,

regarding former President Trump's failure to stop the riot as well as affirmative steps he took to further encourage it." ECF 39 at 2. Undersigned counsel is coordinating with supervision to ensure an appropriate response to the defendant's requests.

Accordingly, the United States respectfully requests that the time in which to file its response to defendant's motion to compel discovery (ECF 39) be extended until on or before November 29, 2022, and the time for the defendant to file his reply, if any, be continued to on or before December 6, 2022. The United States does not anticipate that this request will require adjustment of the December 2, 2022, status conference set in this case, any other pretrial scheduling dates set by this court, or the trial date.

Counsel of record for the defendant has consented to this motion.

Respectfully submitted,

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