

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>Case No. 21-cr-180-RJL</b>
<b>v.</b>	:	
	:	
<b>ELIAS COSTIANES,</b>	:	
	:	
<b>Defendant.</b>	:	

**MOTION FOR EXTENSION OF TIME**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, hereby submits the following Motion for Extension of Time and in support thereof sets forth the following:

1. Defendant Costianes has filed a Second Motion to Dismiss Count 1 (ECF No. 46); a motion to Dismiss Case (ECF No. 48); a Motion to Compel Discovery (ECF No. 49); and a Supplemental Motion to Suppress Statements (ECF No. 50);
2. This Court entered an Order requiring the government to file its response to the Defendant's Motions by July 15, 2022.
3. By this pleading the government seeks an additional 7 days, until July 22, 2022 within which to respond to the Defendant's above Motions. This additional time is not sought for the purpose of delay but rather to permit the government sufficient time to review the case, including ongoing discovery productions in this case relative to the Defendant's Motions, secure documentation of the same and prepare an appropriate response to inform the Court of the facts and circumstances surrounding the Defendant's Motions.
4. Counsel for the Defendant does not object to the Government's request for an extension of 7 days to respond to the Defendant's Motions.

WHEREFORE, the United States respectfully requests that This Honorable Court enter an order permitting the government to file its response to Defendant Costianes's Motions no later than July 22, 2022.

Respectfully submitted,

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D.C. Bar No. 481052

s/ Christopher M. Cook  
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