

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Case No.: 21-CR-026 (CRC)

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER MICHAEL ALBERTS

Defendant.

\_\_\_\_\_ /

**UNOPPOSED MOTION FOR EXTENSION TO SUBMIT A REPLY**

COMES NOW, Defendant, CHRISTOPHER MICHAEL ALBERTS, (hereinafter, "Defendant" or "Mr. Alberts"), by and through undersigned counsel, respectfully requests the Court permit Defendant an additional seven (7) days to Reply to the United States of America's Response in Opposition (D.E. 52) to Defendant's Motion to Dismiss (D.E. 40) and states:

**DISCUSSION**

1. On February 10, 2022, Defendant filed a Motion to Dismiss (D.E. 40).
2. On May 19, 2022, the United States submitted an Opposition to Defendant's Motion to Dismiss (D.E. 52).

3. Defendant desires to submit a Reply to the United States Opposition; however, undersigned is requesting an additional seven (7) days to submit same.

4. For the Court's consideration, undersigned is out of state seeking treatment for the injuries sustained from his February 2022 accident.

5. This motion is made in good faith, not for purposes of delay, and the United States is *unopposed* to the additional time sought.

#### **CERTIFICATION OF CONFERRAL**

Undersigned certifies that he has conferred with counsel for the United States prior to filing this motion and they are *unopposed* to the relief sought.

/s/Kenneth W. Ferguson

Kenneth W. Ferguson, Esq.

**WHEREFORE**, Defendant respectfully request a seven (7) day extension up and through June 1, 2022, to file a Reply to the United States Response in Opposition (D.E. 52) to Defendant's Motion to Dismiss (D.E. 40); and anything further the Court deems just and proper under the circumstances.

Respectfully Submitted,

**FERGUSON LAW, P.A.**

Attorney for Defendant

1 East Broward Blvd. Suite #700

Fort Lauderdale, Florida 33301

T – (954) 256 - 5646

F – (954) 256 - 5655

Primary: Wayne@FergusonLawPA.com

Secondary: Service@FergusonLawPA.com

/s/ Kenneth W. Ferguson

Kenneth W. Ferguson, Esq.

~Psalm 23~

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of May, 2022, a copy of the foregoing was efiled, served, and/or delivered to counsel of record or case registered parties by the CM/ECF court system.

**FERGUSON LAW, P.A.**

Attorney for Defendant

1 East Broward Blvd. Suite #700

Fort Lauderdale, Florida 33301

T – (954) 256 – 5646

F – (954) 256 – 5655

Service: Service@FergusonLawPA.com

E-Mail: Wayne@FergusonLawPA.com

/s/ Kenneth W. Ferguson

Kenneth W. Ferguson, Esq.