

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

CHRISTOPHER WORRELL,

Defendant.

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Case No: 21-CR-292 RCL

**GOVERNMENT'S STATEMENT AND UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE SUPPLEMENTAL BRIEF**

The United States of America respectfully submits this update and moves the Court for an extension of time—to May 25, 2021—to submit an update to the Court regarding defendant Christopher Worrell's medical condition and treatment, as required by this Court's May 14, 2021 Order. *See* Dkt. 50.

Upon information and belief, Mr. Worrell visited an oncologist at Howard University Hospital yesterday, May 19, 2021. According to the D.C. Jail, it typically takes several days for the jail's medical staff to obtain a full consult report from an outside specialist physician like this oncologist. The government has therefore not received a full report regarding the oncologist's conclusions or treatment plan. The government and defense counsel were notified, however, that the oncologist recommended a bone marrow biopsy and imaging to check for disease recurrence/progression, and that the D.C Jail's medical staff have received written referrals for these procedures. The government reached out directly to the oncologist to determine whether further information could be obtained, but the government has not yet received any further information.

In light of those circumstances, the government respectfully moves this Court for an order permitting the government to submit an update on Mr. Worrell's medical condition and treatment

by May 25, 2021. Counsel for the Mr. Worrell does not oppose the motion. A proposed order is attached to this motion.

Respectfully submitted,

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/s/ William Dreher  
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**ORDER**

In consideration of the government's representation that it has not yet received medical records from the defendant's May 19, 2021 oncology appointment, and the parties' agreement that an extension of time to update the Court is therefore warranted, the government is **ORDERED** to file its supplemental brief by May 25, 2021 to update the Court on the defendant's medical condition and treatment. The defendant may file a reply to that supplemental brief by May 26, 2021.

**IT IS SO ORDERED.**

Date: \_\_\_\_\_

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Royce C. Lamberth  
United States District Judge