

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

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v.

Case No. 21-CR-00046-RDM

PATRICK MONTGOMERY and
BRADY KNOWLTON,

Defendants

**DEFENDANTS’ JOINT MOTION FOR EXTENSION OF TIME TO
FILE SUPPLEMENTAL BRIEFS ON DEFENDANTS’ MOTION TO DISMISS**

TO THE HONORABLE RANDOLPH D. MOSS, UNITED STATES DISTRICT
JUDGE FOR THE DISTRICT OF COLUMBIA:

PATRICK MONTGOMERY and BRADY KNOWLTON, the Defendants in the
above styled and numbered cause, by and through their respective, undersigned coun-
sel, respectfully request an extension of time to file supplemental briefs as requested
by this Court on Defendants’ Motion to Dismiss Count Ten of the Indictment (Doc.
39). In support thereof, Defendants would show the following.

1. Presently pending before this Court is Defendants’ Motion to Dismiss Count Ten
of the Indictment (Doc. 39; *see* Doc. 40 – Defendant Patrick Montgomery’s Motion
for Joinder).
2. On August 3, 2021, this Court held a hearing on Defendants’ motion and indicated
that additional briefing would assist the Court in resolving the issues raised
therein. *See* Transcript of Video Motion Hearing (VMH) at 5. The parties so moved
and this Court ordered that Defendants file their brief by September 3, 2021 and
that the Government respond by September 17, 2021. VMH at 64–65.

3. While Defendants' counsel have been working diligently on their brief, additional time is needed to fully address and brief the issues raised in their motion as well as those raised by the Court. Defendants are requesting a two-week extension of the present deadlines.
4. Counsel for Mr. Knowlton has conferred with Counsel for the Government and the Government is not opposed to an extension of the deadlines for both parties.

WHEREFORE, PREMISES CONSIDERED, the Defendants respectfully request this Honorable Court grant them a two-week extension of time to file briefs related to Defendants' motion to dismiss such that Defendants' brief is due on September 17, 2021 and the Government's brief is due October 1, 2021.

Date: September 3, 2021

Respectfully Submitted,

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ATTORNEY FOR THE DEFENDANT,
PATRICK MONTGOMERY

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the Government, Elizabeth Kelley, James Peterson, and James Pearce, on September 3, 2021, via CM/ECF and email.

/s/ T. Brent Mayr
T. BRENT MAYR