

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

UNITED STATES OF AMERICA

v.

**PATRICK MONTGOMERY and
BRADY KNOWLTON,**

Defendants

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Case No. 21-CR-00046-RDM

**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 counsel, 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

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Case No. 21-CR-00046-RDM

ORDER ON
DEFENDANTS' JOINT MOTION FOR EXTENSION OF TIME TO
FILE SUPPLEMENTAL BRIEFS ON DEFENDANTS' MOTION TO DISMISS

On this day, came to be heard the Defendants' Joint Motion for Extension of Time to File Supplemental Briefs related to their Motion to Dismiss Count Ten of the Indictment. After considering the same, the Court finds that the motion should be

_____ GRANTED. The Defendants are to file a brief with the Court by September 17, 2021. The Government is to file their responsive brief with the Court by October 1, 2021.

_____ DENIED.

SIGNED AND ENTERED ON _____.

Judge Randolph D. Moss
United States District Judge