

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

UNITED STATES OF AMERICA,

v.

RICHARD BARNETT,

Defendant.

Case No. 21-cr-0038 (CRC)

**DEFENDANT RICHARD BARNETT'S
MOTION FOR AN EXTENSION OF TIME TO FILE PRETRIAL MOTIONS**

Pursuant to Rule 45(b)(1)(b) of the Federal Rules of Criminal Procedure, Richard Barnett, through his attorney, Joseph D. McBride, Esq., respectfully requests that this Honorable Court modify the March 30, 2022, MINUTE ORDER. Specifically, Mr. Barnett asks this Court to extend the due dates for the PRETRIAL MOTIONS by thirty (30) days.

Undersigned counsel apologizes for missing the previous filing deadline and writes to inform this Honorable Court that there is indeed good cause for missing said deadline. Good cause is demonstrated by the fact that undersigned counsel tested positive for COVID 19 during the last week of May 2022 and has not yet fully recovered. Undersigned counsel's two young children required hospitalization because of dangerously high COVID related fevers. Importantly, all the members of undersigned counsel's household and domestic support system are still recovering as well, which in turn has left him without childcare.

Undersigned counsel inquired with the Government regarding this request for a thirty-day extension on June 6, 2022. The Government informed undersigned counsel that it will not be opposing his extension request under these circumstances on June 7, 2022.

Having therefore established good cause and received no objection by the Government to this request, undersigned counsel, respectfully asks this court to excuse his failure to meet the previous pretrial motion date, and to extend the pretrial motion filing deadline to July 6, 2022.

Dated: Washington, D.C.
June 8, 2022

Respectfully submitted,

/s/ Joseph D. McBride, Esq.

Bar ID: NY0403
THE MCBRIDE LAW FIRM, PLLC
99 Park Avenue, 6th Floor
New York, NY 10016
p: (917) 757-9537
e: jmcbride@mcbridelawnyc.com
Counsel for Petitioner