

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

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Case No.: 1:21-CR-247-TFH**

**BRADLEY WAYNE WEEKS,**

**Defendant.**

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**UNOPPOSED MOTION TO EXTEND DEADLINE FOR REPLIES**

Defendant, Bradley Wayne Weeks, by and through undersigned counsel and pursuant to Fed.R.Cim.P. 45(b) hereby moves this Honorable Court for its Order extending the deadline to file replies in this case for seven (7) days, making any motions due Monday, August 22, 2022. In support thereof, Defendant states:

1. Following various extensions of time sought by both Defendant and the Government, replies to the Government's Opposition to Defendant's Motion to Dismiss Count One of the Indictment and Motion for Bill of Particulars are due August 13, 2022.<sup>1</sup>

2. Since the filing of Defendant's Motions, undersigned counsel's firm

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<sup>1</sup> August 13, 2022 is a Saturday. Pursuant to Fed.R.Crim.P. 45(a)(1)(C), when a filing is due on a Saturday, Sunday or legal holiday, "the period continues to run until the end of the next day that is not a Saturday, Sunday or legal holiday." Accordingly, the replies are due on August 15, 2022.

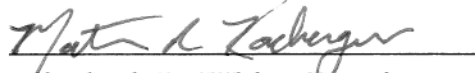
had a partner leave, necessitating undersigned counsel to assume responsibility for a large number of cases with very little notice. Such unanticipated departure and assumption of responsibility has delayed undersigned counsel's ability to prepare the replies. Additionally, undersigned counsel's wife has had to leave for Montreal, Canada to attend her younger brother's wedding, leaving undersigned counsel to handle his three sons (two in high school and one in middle school) return to school for the coming year which has further impaired undersigned counsel's ability to prepare the replies.

3. Fed.R.Cim.P. 45(b)(1)(A) provides: "When an act must or may be done within a specified period, the court on its own may extend the time, or for good cause may do so on a party's motion made: before the originally prescribed or previously extended time expires...."

4. Undersigned counsel has conferred with Assistant United States Attorney Jamie Carter and is authorized to represent that the Government does not oppose the relief requested herein.

WHEREFORE, Defendant respectfully requests this Honorable Court extend the replies deadline in this cause for a period of seven (7) days, making motions due on or before August 22, 2022.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Matthew R. Kachergus", is written over a horizontal line.

Elizabeth L. White, Esquire

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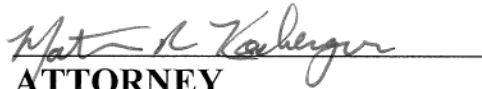
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COUNSEL FOR DEFENDANT

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on August 15, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

**Jamie Carter, Assistant U.S. Attorney  
Anne Veldhuis, Assistant U.S. Attorney  
U.S. Attorney's Office for the District of Columbia  
555 Fourth Street, NW  
Washington, DC 20530**

  
**ATTORNEY**