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FEDERAL PUBLIC DEFENDER
FOR THE DISTRICT OF ALASKA
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Counsel for Defendant Damon Michael Beckley

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAMON MICHAEL BECKLEY,

Defendant.

Case No. 1:21-cr-00285-JEB

**PARTIALLY UNOPPOSED
MOTION TO EXTEND DEADLINE
FOR AMENED MOTION FOR
NEW TRIAL**

Defendant Damon Michael Beckley, through counsel, Gretchen L. Staff, Assistant Federal Defender, moves this Court to extend the April 28, 2028 deadline to file the defendant's amended motion for a new trial at least three weeks, and to reset the response and reply deadlines accordingly.

Additional time is needed to confer with Mr. Beckley and to provide effective assistance of counsel with regard to his claims. Investigation and relevant discovery review is taking much longer than first anticipated, particularly given the vastness and unconventional structuring of discovery and the time needed for undersigned counsel and support staff to gain access and proficiency with the relevant databases.

Undersigned counsel also notes that on April 25, 2023, a Petition for Panel Review was filed regarding the D.C. Circuit's decision in *United States v. Fischer*, 64 F.4th 329

(D.C. Cir. 2023) and suggests it may be fruitful to wait for the Court's decision in that matter.

The Government is *unopposed* to a three-week extension of the motion deadline but objects to a longer extension or to further delay based on the *Fischer* litigation.

DATED at Anchorage, Alaska this 28th day of April, 2023.

Respectfully submitted,
FEDERAL PUBLIC DEFENDER
DISTRICT OF ALASKA

/s/ Gretchen L. Staft

Gretchen L. Staft
Assistant Federal Defender

Certificate of Service:

I hereby certify that I electronically filed the foregoing and any attachments with the Clerk of Court for the United States District Court for the District of Alaska by using the district's CM/ECF system on April 28, 2023. All participants in this case are registered CM/ECF users and will be served by the district's CM/ECF system.

/s/ Gretchen L. Staft