UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	**Case No. 1:21-cr-00222 (TFH)**
	:	
GEORGE PIERRE TANIOS,	:	
	:	
and	:	
	:	
JULIAN ELIE KHATER,	:	
	:	
Defendants.	:	

GOVERNMENT'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE RESPONSES TO DEFENDANTS' MOTIONS

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully requests that the Court grant the government additional time to file its responses to the defendants' motions filed on February 24, 2022. As grounds for this request, the government states the following:

1. On January 20, 2022, the Court set this matter for a motions hearing on April 8, 2022, at 10:00 a.m., and trial to commence on June 6, 2022, at 9:30 a.m., with a scheduling order to follow. *See* minute order dated January 20, 2022.

2. On January 26, 2022, by way of Pre-Trial Order, the Court set a motions schedule requiring "any pre-trial motions, including motions to suppress and motions *in limine*" due by February 24, 2022, "oppositions shall be filed by March 17, 2022, and replies shall be filed by March 28, 2022." Document 51.

3. The parties have discussed certain aspects of this case and whether the matter can be resolved short of trial. The parties would like additional time to exhaust those options and other issues.

4. Joseph Tacopina, Esquire, and Chad Seigel, Esquire, counsel for defendant Julian Khater, and Elizabeth Gross, Esquire, Linn Richard Walker, Esquire, Christopher M. Davis, Esquire, and Aaron D. Moss, Esquire, counsel for defendant George Tanios, have no objection to this request.

5. Based on the forgoing, the government requests an additional two weeks to respond to the defendants' motions, and would suggest the Court adjust the parties' response deadline and the date of the motions hearing, accordingly.

6. Therefore, the Government requests that its responses to defendants' motion be due on March 31, 2022, and would suggest the Court adjust the parties' response deadline and the date of the motions hearing, accordingly.

Respectfully submitted,

Matthew M. Graves
United States Attorney
DC Bar No. 481052

By: */s/ Anthony Scarpelli*

Anthony Scarpelli
D.C. Bar No. 474711
Gilead Light
D.C. Bar No. 980839
Assistant United States Attorneys
Violent Crime and Narcotics Trafficking Section
555 4th Street, NW, 4th Floor
Washington, DC 20530
(202) 252-7707 (Scarpelli)
(202) 252-6880 (Light)
Anthony.Scarpelli@usdoj.gov
Gilead.light@usdoj.gov