

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES of AMERICA	:	
	:	
Plaintiff	:	
	:	Criminal Case No.: 21-CR-00127
v.	:	
	:	
JOSHUA MATTHEW BLACK	:	
	:	
Defendant	:	

.....

DEFENDANT’S MOTION
TO EXTEND TIME WITHIN WHICH TO FILE DEFENDANT’S MOTION TO
CHANGE VENUE, TIME FOR FILING HAVING EXPIRED

The Defendant, **JOSHUA MATTHEW BLACK**, by and through his attorney, Clark U. Fleckinger II, moves this Honorable Court, to extend the time within which to file [HIS] Motion to Change Venue, Time For Filing Having Expired. As grounds therefore, Mr. Black represents as follows:

1. That, pursuant to the Court’s March 18, 2022 Order, pretrial defense motions required pursuant to Fed.R.Crim.P. 12 were to be filed on or before April 22, 2022. Pursuant to two motions to extend the time for filing, the time for filing such motions was extended to April 28, 2022.
2. That, the only motion filed by Mr. Black at that time was a Motion to Dismiss Count 1 of the indictment.
3. That, undersigned counsel did not file a motion to change venue.
4. That, during telephone conversations with Mr. Black on December 8 and 9, 2022, Mr. Black specifically asked counsel to file a motion to change venue on his behalf. That request was/is related to his concern that he would not be able to select an impartial jury at the time of trial in the above referenced matter.

5. That, [Mr. Black's] Motion to Change Venue is being filed contemporaneously with the instant motion.

6. That, while Mr. Black recognizes that the request made herein has some adverse impact on both the Government and the orderly and efficient administration of justice, counsel respectfully submits that Mr. Black's right to due process and a fair trial with an impartial jury should trump any adverse impact as referenced above.

WHEREFORE, the Defendant respectfully requests that the Court extend the time within which to file [his] Motion to Change Venue to December 19, 2022.

Respectfully submitted,

_____/S/_____
Clark U. Fleckinger II
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Bar No. 362393

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Defendant's Motion to Extend Time Within Which to File Defendant's Motion to Change Venue, Time For Filing Having Expired has been served, by ECF, upon AUSA Seth Adam Meinero and all counsel of record, at the United States Attorney's Office, this 19th day of December, 2022.

_____/S/_____
Clark U. Fleckinger II