UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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:	Case No. 21-CR-52-1 (TJK)
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GOVERNMENT'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO DEFENDANT PEZZOLA'S MOTION FOR BAIL TO PLACE DEFENDANT ON CONDITIONAL RELEASE PENDING TRIAL

The United States hereby respectfully moves the Court for a two-week enlargement of time within which to respond to defendant Dominic Pezzola's Motion for Bail to Place Defendant on Conditional Release Pending Trial (Doc. 65), which was filed on July 9, 2021. If the instant motion is granted, the government's response would be due on August 6, 2021. The government proposes providing the defendant with an additional week—that is, until August 20, 2021—to file any reply. The government conferred with defendant's counsel, who stated that the defense is unopposed to this motion.

In support of this motion, the government states the following:

1. On July 9, 2021, the defendant filed a 57-page motion for release from custody (Doc. 65). As of this filing, the defendant has not filed a motion to file this motion in excess of the page-limit requirement established by LCrR 47(e), but the government notes for the record that it does not oppose the filing in excess of the page limits.

2. Given the length of the defendant's motion and the number of issues raised therein, some of which will require consultation with outside agencies such as the D.C. Department of Corrections, the government requests an additional two weeks—that is, until August 6, 2021, to

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file its response. In seeking this relief, the government proposes that the Court provide an extension of one week—that is, until August 20, 2021—for the defendant to file any reply in support of his motion.

3. The government submits that the requested relief would not adversely affect the pace of litigation in this case, in which discovery is ongoing and the Court has not yet set deadlines for dispositive motions.

WHEREFORE, the government requests that the Court grant the government's motion and enter the attached, proposed order.

Respectfully submitted,

CHANNING D. PHILLIPS Acting United States Attorney D.C. Bar No. 415793

<u>/s/ Erik M. Kenerson</u> ERIK M. KENERSON Ohio Bar No. 82960 U.S. Attorney's Office for the District of Columbia Assistant United States Attorneys 555 4th Street, N.W. Washington, D.C. 20530 (202) 252-7201 Erik.Kenerson@usdoj.gov

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-52-1 (TJK)
	:	
DOMINIC PEZZOLA,	:	
	:	
Defendant.	:	

ORDER

Upon consideration of the government's motion for an enlargement of time in which to respond to defendant Pezzola's Motion For Bail to Place the Defendant on Conditional Release Pending Trial, it is this _____ day of July, 2021, ORDERED that the government's motion is GRANTED.

It is FURTHER ORDERED that the government's memorandum in opposition to defendant Pezzola's Motion for Bail to Place the Defendant on Conditional Release Pending Trial shall be filed no later than August 6, 2021. It is

FUTHER ORDERED that any reply to the government's opposition that defendant Pezzola wishes to file be filed no later than August 20, 2021.

SO ORDERED.

Timothy J. Kelly United States District Judge