

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

**UNITED STATES OF AMERICA**            )  
  )  
                  **v.**                                    )  
  )  
**SCOTT KEVIN FAIRLAMB,**                    )  
                                  **Defendant.**                            )

**Criminal No. 1:21-cr-00120 (RCL)**

**UNITED STATES’ MOTION FOR AN EXTENSION OF TIME TO FILE ITS  
RESPONSE TO DEFENDANT’S MOTION UNDER 28 U.S.C. § 2255 TO  
VACATE, SET ASIDE, OR CORRECT SENTENCE**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully requests that it be granted until December 13, 2022, to file its response to defendant Scott Kevin Fairlamb’s Motion Under 28 U.S.C. § 2255 to Vacate, Set Aside, or Correct Sentence. In support of this request, the government respectfully submits the following:

1. On September 13, 2022, the defendant filed a Motion Under 28 U.S.C. § 2255 to Vacate, Set Aside, or Correct Sentence. On September 14, 2022, the Court ordered the government to respond to defendant’s motion within 30 days or such further time as the Court allows.

2. The United States seeks an extension of 60 days to file the response in this matter. Undersigned counsel entered her notice of appearance and substitution of counsel on October 11, 2022. Undersigned counsel has reviewed petitioner’s pleading and has begun gathering documents and files relevant to this matter. However, because undersigned counsel is not familiar with the facts of the instant case and in light of undersigned counsel’s pre-existing duties and caseload, additional time is necessary to draft and complete the government’s response.

3. The United States seeks an extension of time in part to allow undersigned counsel sufficient time to review the case file and defendant's motion; to obtain and review transcripts from court proceedings; and to research and prepare the government's response.

4. This is the government's first motion for an extension. On October 11, 2022, undersigned counsel contacted counsel for the defendant, Dennis E. Boyle, Esq. and Blerina Jasari, Esq., in regard to this motion. Defense counsel has not responded with their position on the motion.

6. Based on the foregoing, the United States respectfully requests until December 13, 2022, to file its opposition. The United States will endeavor to file its response sooner than that date if reasonably possible.

7. A proposed Order is attached.

Respectfully submitted,

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D.C. Bar Number 481052

BY: /s/ Sarah W. Rocha  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this 12th day of October 2022 I caused a copy of the foregoing motion and proposed order to be served on defense counsel of record via ECF.

/s/ Sarah W. Rocha  
SARAH W. ROCHA  
Trial Attorney