

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

PLAINTIFF,

V.

CASE NO. 1:21-CR-00421-JDB

JOHN MARON NASSIF,

DEFENDANT.

**Unopposed Motion for Extension of Time to file Motion for New Trial
and Motion for Judgment of Acquittal**

The Defendant, John Maron Nassif, by and through his undersigned attorney, hereby moves this Honorable Court to enter its Order extending the time for filing a motion for new trial and a motion for judgment of acquittal in the above-styled case, for a period of twenty (20) days. As grounds in support thereof, the Defendant would state the following:

1. That the Defendant was found guilty of all four counts charged in the Information on December 8, 2022.

2. That the deadline for filing a motion for new trial is fourteen (14) days after the entry of the verdict. Fed. R. Crim. P. 33(b)(2). The deadline for filing a motion for judgment of acquittal is also fourteen days after the entry of the verdict. Fed. R. Crim. P. 29(c)(1). Thus, the due date for filing a motion for new trial, as well as a motion for judgment of acquittal, would be this Thursday, December 22, 2022.

3. That the undersigned is in the process of ordering transcripts from the court reporter of portions of the trial testimony in the case. Upon review of said

transcripts, the undersigned will determine whether there are grounds to file a motion for new trial, as well as a motion for judgment of acquittal in this case. The undersigned is requesting an additional twenty days, or until January 11, 2023, in which to file said motions.

4. That the undersigned has contacted government counsel regarding the relief sought by this motion. Government counsel has advised the undersigned that it does not oppose the extensions of time sought by this motion.

5. Accordingly, the undersigned requests that this Honorable Court enter its Order allowing an extension of time of twenty days, or until January 11, 2023, in which undersigned can file a motion for new trial and a motion for judgment of acquittal.

Memorandum of Law

Federal Rule of Criminal Procedure 33(a) provides that the Court may vacate any judgment and grant a new trial. The rule also provides that the court may, in the case of a non-jury trial, take additional testimony and enter a new judgment. Federal Rule of Criminal Procedure 29(b)(2) provides that a motion for new trial, grounded on any reason other than newly discovered evidence, must be filed within 14 days of entry of the verdict.

Federal Rule of Criminal Procedure 29(c)(1) provides that a defendant may move for a judgment of acquittal or renew a judgment of acquittal within fourteen days after the entry of the verdict.

The Defendant in the instant case seeks additional time in which to file a motion for new trial and a motion for judgment of acquittal. The undersigned's office

has contacted the court reporter and is ordering a transcription of portions of the trial. Thus, the undersigned seeks an additional twenty days in which to file a motion for new trial and a motion for judgment of acquittal.

Respectfully submitted,

A. Fitzgerald Hall, Esq.
Federal Defender, MDFL

/s/ James T. Skuthan
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Certificate of Service

I hereby certify that on December 19, 2022, I electronically filed the foregoing via this Court's CM/ECF system, which will send notice of such filing to all counsel of record.

/s/ James T. Skuthan
James T. Skuthan, Esq.
Attorney for Defendant