

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.

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**Second 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 for an additional period of seven 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. The undersigned moved for an extension of time to file any motion for new trial and motion for judgment of acquittal on December 19, 2022. Doc. 67. This Court granted said motion, allowing the filing of said motions for a period of twenty days on December 20, 2022.
3. That the undersigned received the pertinent trial transcripts one week ago, on January 4, 2023.

4. That the undersigned needs an additional seven days to review the record and the transcripts in this case. Thus, the undersigned moves this Court to extend the time for filing a motion for new trial and a motion for judgment of acquittal for an additional seven days. The undersigned will not request any further extensions.

5. 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.

6. Accordingly, the undersigned requests that this Honorable Court enter its Order allowing an extension of time of seven days 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. That the undersigned

received the trial transcripts one week ago, on January 4, 2023. Thus, the undersigned seeks an additional seven days in which to review the record and the transcripts. Thus, undersigned seeks an additional extension of seven 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  
James T. Skuthan, Esq.  
First Assistant Federal Defender  
Florida Bar No. 0544124  
201 South Orange Avenue, Suite 300  
Orlando, FL 32801  
Telephone: 407-648-6338  
Fax: 407-648-6095  
E-Mail: jim\_skuthan@fd.org

**CERTIFICATE OF SERVICE**

I hereby certify that on January 11, 2023, 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