

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

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 21-cr-131 (PLF)
)	Senior Judge Friedman
JASON GERDING)	Motions Hearing: March 13, 2023
AND)	
CHRISTINA GERDING)	

**UNOPPOSED JOINT MOTION TO EXTEND DEADLINES
FOR PRETRIAL MOTIONS AND RELATED FILINGS**

COMES NOW the defendants, Jason and Christina Gerding, by and through undersigned counsel, and respectfully move this Honorable Court to extend the deadlines for pretrial motions and related filings. In support of this motion, Mr. and Ms. Gerding would show:

1. Currently, pretrial motions are due in this case on December 2, 2022. Responses are due on January 14, 2023, and replies are due on February 10, 2023. The motions hearing is scheduled for March 13, 2023.
2. Due to an unusually heavy workload related in part to handling a large number of cases involving the events at the Capitol on January 6, 2021, counsel for Mr. and Ms. Gerding are not in position to file pretrial motions for Mr. and Ms. Gerding on December 2, 2022. Additionally, counsel for Mr. Gerding is currently in trial. Accordingly, Mr. and Ms. Gerding request that the deadline for pretrial motions and related filings be extended. Specifically, they request that the deadline for the defendants’ pretrial motions be extended by three weeks—that is, to December 23, 2023. Also, they request that the deadline for the government to file its responses be similarly extended by three weeks—that is, to February 4, 2023. Finally, they

request that the deadline for the defendants to file their replies be extended by two weeks—that is, to February 24, 2023.

3. If the Court grants this motion to extend the deadlines for pretrial motions and related filings, the issues raised in the defendants’ pretrial motions will be fully briefed by February 24, 2023, which is still almost three weeks before the motions hearing.

4. During the period of November 30, 2022 to December 1, 2022, undersigned counsel for Ms. Gerding exchanged e-mails with Assistant United States Attorneys Anthony Franks and Nialah S. Ferrer. AUSAs Franks and Ferrer have graciously indicated that the government does not oppose this motion by Mr. and Ms. Gerding to extend the deadlines for pretrial motions and related filings as indicated above.

WHEREFORE, the defendants, Jason and Christina Gerding, move this Honorable Court to extend the deadlines for pretrial motions and related filings.

Respectfully submitted,

 /s/
Jerry Ray Smith, Jr.
D.C. Bar No. 448699
Counsel for Christina Gerding
717 D Street, N.W.
Suite 310
Washington, DC 20004
E-mail: jerryraysmith@verizon.net
Phone: (202) 347-6101

 /s/
Eugene Ohm
Assistant Federal Public Defender
Counsel for Jason Gerding
625 Indiana Avenue
Suite 550
Washington, DC 20004
E-mail: eugene_ohm@fd.org
Phone: (202) 208-7500