UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

v. : Case No. 1:21-cr-382 (PLF)

:

CHRISTOPHER WARNAGIRIS,

:

Defendant. :

GOVERNMENT'S MOTION TO EXTEND TIME TO FILE OPPOSITION

The United States, by and through its attorney, the United States Attorney for the District of Columbia, respectfully requests this Court permit the government to file any opposition to the defendant's supplemental motion for *Brady* material, ECF No. 88, by October 27, 2023. On October 16, 2023, the Court held a hearing on, among other things, the defendant's motion for *Brady* material. ECF Nos. 62, 75, 80. At the end of the hearing, the Court indicated that the parties should file any additional memoranda by "midday" Friday, October 20.

Today, the defendant filed his supplemental brief, which contains significant and previously unraised factual assertions. ECF No. 88. The government seeks adequate time to evaluate and respond to the defendant's novel claims, if necessary. The government requests an extension from today to next Friday, October 27. This brief extension will not prejudice the defendant as, to the government's knowledge, his motion will be addressed at the pretrial conference on October 30, 2023. Further, an extension of one week is within the 14 days permitted by local rule to file memoranda in opposition. LCrR 47(b).

Respectfully submitted,

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