

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

UNITED STATES OF AMERICA

v.

JEFFREY MCKELLOP,

Defendant.

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CR. NO. 21-CR-268 (CJN)

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT’S PROPOSAL FOR ADJUDICATING PRIVILEGED
MATERIAL AND FOR A HEARING**

The United States of America, by and through its attorney, the Acting United States Attorney for the District of Columbia, respectfully requests an extension of time to respond to defendant Jeffrey McKellop’s Proposal for Adjudicating Privileged Material, ECF No. 87, filed on June 1, 2022. The government respectfully requests that this Court extend the response deadline of June 3, 2022, to June 8, 2022. The government further requests that the Court set a hearing on June 9, 2022, or June 10, 2022, to address that proposal and other matters as stated below.

In support of its request, the government submits that due to unforeseen circumstances, additional time is needed to respond to the defendant’s June 1, 2022, submission. The government further requests a hearing on June 9, 2022, or June 10, 2022, to address the filter protocols, the fully briefed sealed matter, and trial readiness matters, including the arraignment of the defendant on the Second Superseding Indictment, ECF No. 86. The undersigned have conferred with counsel for the defendant, who does not oppose this Motion.

WHEREFORE, for the foregoing reasons, which constitute good cause, and any other reasons that this Court deems just and proper, the government requests that its deadline to respond to the Defendant’s Proposal for Adjudicating Privileged Material be extended to June 8, 2022, and

that the Court set a hearing on June 9, 2022, or June 10, 2022.

Respectfully submitted,

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