

**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**

The United States of America, by and through its attorney, the Acting United States Attorney for the District of Columbia, respectfully requests a short further extension of time to respond to defendant Jeffrey McKellop’s Proposal for Adjudicating Privileged Material, ECF No. 87, filed on June 1, 2022. This Court previously granted the government’s request to extend the response deadline of June 3, 2022, to June 8, 2022. The government now respectfully requests that this Court extend the response deadline of June 8, 2022, to June 9, 2022, at 5 pm.

In support of its request, the government submits that a short further extension is needed in order for the government to fully address the defendant’s Proposal in its response. The undersigned have conferred with counsel for the defendant, who does not oppose this Motion. The government notes that the proposed extension would still require submission of the government’s response before the hearing set for June 10, 2022, at 9 am.

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 9, 2022, at 5 pm.

Respectfully submitted,

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