UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

]
UNITED STATES OF AMERICA]
]
v.] Case No. 21-cr-283
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GRAYSON SHERRILL] Judge Chutkan
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DEFENDANT GRAYSON SHERRILL'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE PLEADINGS

Defendant Sherrill Grayson, through undersigned counsel, respectfully moves this Court, with the consent of the govenrment, for an extension of time to file pleadings in this case, until November 30, 2022.

In support of this motion Mr. Sherrill states the following:

1. The Court scheduled the initial deadlines for suppressions motions for October 31, 202, with oppositions on November 14, and replies on November 21. Other pretrial motions are scheduled for November 7, with oppositions on November 21, and replies on November 29. FRE 404(b) notice is due November 14, 2022. Motions in limine are due November 14, 202, with responses due November 29, and responses on December 6. Voire dire, Jury instructions, Expert Witness notice, and Brady/Giglio are due December 5, 2022. Exhibits lists are due November 28, 2022, and objections are due by December 5, 2022. A pretrial conference is scheduled by video conference on December 14, 2022, and Jury trial is scheduled for January 3, 2023/

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2. The parties are diligently working to resolve this case without trial. The parties

agree that additional time, until November 30, 2022, is necessary for the government to review

the case and negotiate in light of all case factors, as well as factors in relation to other cases, and

for the defendant to respond. The parties are engaging in productive negotiations. This

additional time will avoid the unnecessary time and expense for the Court and parties of filing and

litigating unnecessary pleadings.

For the reason stated above, the defendant respectfully requests, in consultation with the

government, that the pleadings deadlines be extended until November 30, 2022.

Respectfully submitted,

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