

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

UNITED STATES OF AMERICA

v.

ROBERT GIESWEIN,

Defendant.

Crim. Action No. 21-24-1 (TNM)

**JOINT MOTION TO EXTEND DEADLINES**

The United States of America, through undersigned counsel, and the defendant, Robert Gieswein, through his attorney Blake Weiner, Esq., request that the Court modify the Pretrial Order issued by Judge Sullivan, ECF 132, to extend the deadlines by which the parties may take certain pretrial actions. In support of this motion, the government states as follows:

1. On January 11, 2023, the Court granted defendant Gieswein's motion to substitute counsel, allowing Mr. Gieswein's current attorney Blake Weiner to formally begin representation of the defendant. At the time Mr. Weiner became counsel of record, there was an outstanding plea offer that had been extended by the United States for Mr. Gieswein's consideration.

2. Undersigned counsel conferred with Mr. Weiner, who asked that the offer remain outstanding long enough to allow him to evaluate the offer and advise Mr. Gieswein about it. The government agreed to do so, and it requested that the defendant join in a motion to extend pretrial deadlines accordingly. Mr. Weiner agreed.

3. Accordingly, the parties request that the deadlines currently in place be modified as follows:

- a. Any required notice pursuant to Fed. R. Evid. 404(b), currently due on January 20, 2023, shall be produced no later than February 17, 2023;
- b. Any government expert notice and pretrial motions, currently due on February 17, 2023, shall be produced and/or filed no later than February 24, 2023;
- c. Oppositions to any motions, currently due on March 10, 2023, shall be filed no later than March 15, 2023;
- d. Replies to those oppositions, if any, which are currently due on March 17, 2023, shall be filed no later than March 22, 2023.

4. Undersigned counsel has provided a copy of this motion and the accompanying proposed order to Blake Weiner, counsel for the defendant, and Mr. Weiner represented that undersigned counsel may filed this as a joint motion.

5. The parties submit that granting this request would not prejudice any party or the Court, as it would still leave ample time for the Court to receive and evaluate the parties' submissions ahead of the scheduled March 31, 2023, motions hearing, *see* ECF 132 at 1-2, and could possibly facilitate a pretrial resolution of this case.

**CONCLUSION**

For the reasons set forth above, the parties respectfully request that the Court grant this request.

Respectfully submitted,

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