

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

**UNITED STATES OF AMERICA**

vs.

**DONOVAN CROWL,  
Defendant**

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**Case No. 21-cr-00028-2 (APM)**

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**MOTION TO EXTEND TIME TO FILE REPLY TO  
GOVERNMENT’S OMNIBUS OPPOSITION TO DEFENDANTS’ MOTIONS**

Donovan Crowl, by his undersigned counsel, respectfully moves this Honorable Court to grant him leave to late-file the Reply to the Government’s Omnibus Opposition to Defendants’ Motions.

1. The Reply is untimely.
2. For various reasons, despite due diligence, counsel had been unable to file the reply until this morning.
3. The issues are complex and novel and implicate serious constitutional issues that required review of extensive legislative history as well as multiple Supreme Court, D.C. Circuit and out-of-circuit cases. Counsel wanted to be certain that all the relevant authority was reviewed before filing the reply. The work took much longer than was anticipated.
4. In addition, to reviewing the extraordinarily voluminous discovery in the instant case, counsel is a solo-practitioner, who is handling a number of other cases that have been designated complex. Those cases are in addition to and unrelated to the January 6 prosecutions.

5. As a result of the press of these matters, that have included court appearances, court filings and sentencing hearings and other activities, counsel had been unable, despite due diligence, to complete the reply in a timely fashion.

6. After filing the Reply, Counsel reached out to government counsel about the government's position on the instant request but has not yet heard back.

WHEREFORE, Donovan Crawl, respectfully requests that the Court grant his motion to late file the Reply to the Government's Omnibus Opposition beyond the due date.

Respectfully submitted,

*/s/ Carmen D. Hernandez*

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#### **CERTIFICATE OF SERVICE**

I hereby certify that the instant notice was served on all counsel of record 7<sup>th</sup> day of September, 2021 on all counsel of record via ECF.

*/s/*

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**Carmen D. Hernandez**