## UNITED STATES DISTRICT COURT THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA		)		
		)		
	٧.	)	No.: Cr.	21-CR-28-APM
		)		
DAVID MOERSCHEL		)		

## UNOPPOSED MOTION FOR ADDITIONAL TIME TO FILE MOTIONS

COMES NOW DEFENDANT DAVID MOERSCHEL, by and through counsel, who respectfully requests that the Court grant him additional time to file motions that he may deem necessary. Indicted in the Fifth Superseding Indictment (Doc. 328), dated August 4, 2021 and unsealed on August 9, 2021, Mr. Moerschel was arraigned on August 10, 2021. After his arraignment, Mr. Moerschel filed a notice to join two motions to dismiss previously filed by codefendants. (Doc. 351). The Government has also been providing discovery, which is rather voluminous and requires considerable time to digest. Therefore, Mr. Moerschel respectfully requests an extension of time of 60 days to file additional motions. Mr. Moerschel has no objection to the continued exclusion of time from the Speedy Trial calculation. Counsel for the government does not object to this request.

Respectfully submitted,

Brown, Suarez, Rios & Weinberg, P.A. Attorney for Defendant 265 E Marion Ave., Ste 114 Punta Gorda, FL 33950 Telephone: (941) 575-8000

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By /s/ Scott Weinberg
Scott Weinberg
Fla. Bar No. 71109

## **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on September 21, 2021, a true and correct copy of the foregoing was furnished by using the CM/ECF system with the Clerk of the Court, which will send notice of the electronic filing to all interested parties, including the Office of the United States Attorney.

Respectfully submitted,

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