

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

UNITED STATES OF AMERICA)	
)	Case No. 21-cr-00028 (APM)
v.)	
)	
KENNETH HARRELSON,)	
)	
Defendant.)	

**UNOPPOSED MOTION TO EXTEND TIME FOR KENNETH HARRELSON TO FILE
REPLY TO GOVERNMENT’S SUPPLEMENTAL BRIEF ON 18 U.S.C. § 1512(c)(2)**

COMES NOW the Defendant, Kenneth Harrelson, by and through counsel, Bradford L. Geyer, Esq., and also on behalf of all co-defendants in the instant case, and without objection from the Government, and respectfully requests that the Court extend the time for the defendant to file his supplement without the requirement of a additional hearing and, in support, states as follows:

1. On September 8, 2021, Defense Counsel entered an appearance to represent Defendant in a hearing on papers filed around issues regarding 18 U.S.C. § 1512(c)(2).

2. On September 22, 2021 the Government filed a 31-page supplemental brief addressing issues raised by the Court regarding those issues. ECF No. 437. The deadline for the defendants to reply was set at October 6, 2021.

3. The Government’s extensive supplemental brief set forth numerous arguments and cited multiple cases, which required all defense counsel to do extensive review and legal research. As a result, defense counsels required and were granted additional time to adequately prepare their replies.

4. Defense counsel, who are overwhelmed with large caseloads and busy trial schedules, issued supplements through yesterday.

5. To preserve judicial economy and to try to synch up with the litigation as best as possible, undersigned counsel had hoped to review all the filings, determine whether there was anything left to add in light of the filings from all sides, that were comprehensive and extensively documented and supported, and issue Defendant's supplement.

6. Having reviewed the filings and having noticed some areas where there may still be value added and, still being in the process of reviewing the equities of making such a filing, I am requesting until October 18, 2021 to reserve the Court's leave to file a final supplement to the record.

7. The Government has been very gracious in permitting me to file this motion unopposed and I represented that we will be standing on any filing we make or don't make on October 18, 2021.

Dated: October 14, 2021

RESPECTFULLY SUBMITTED

/s/ Brad Geyer

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CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2021, a true and accurate copy of the forgoing was electronically filed and served through the ECF system of the U.S. District Court for the District of Columbia.

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