

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

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

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE  
DEFENDANT HARRELSON’S REPLY MOTION FOR  
RECONSIDERATION OF CONDITIONS OF RELEASE**

COMES NOW the Defendant, Kenneth Harrelson, by and through counsel, Bradford L. Geyer, Esq., and without objection from the Government, and respectfully requests that the Court extend the time for the defendant to file a Reply without the requirement of an additional hearing and, in support, states as follows:

1. On November 26, 2021, the Government filed an eight (8) page response (ECF 499) to Defendant Harrelson’s motion for release (ECF 485).
  
2. Defendant’s Reply was due on December 1, 2021.
  
3. On December 2, 2021, the Government released significant Brady material that it has had since May 4, 2021. This directly impacts the risk analysis as to Defendant Harrelson.

4. Undersigned defense counsel, who is overwhelmed with new and old discovery, and a new Indictment, requests until Tuesday, December 7, 2021 to file a Reply.

Dated: December 5, 2021

RESPECTFULLY SUBMITTED

/s/ Brad Geyer  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 5, 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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