

**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 OPPOSITION TO DEFENDANTS’ MOTION FOR
RELEASE ON HUMANITARIAN GROUNDS**

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 his short Reply without the requirement of an additional hearing and, in support, states as follows:

1. On November, 2021, the Government filed a two (2) page non-responsive response (ECF 503) alleging that ECF 489 violated this Honorable Court’s November 1, 2021, minute order (“MO”).

2. Defendant’s motion is a righteous and timely motion that complies in all respects with this Honorable Court’s November 1, 2021, minute order (“MO”). To suggest otherwise is baseless.

3. As is the case in any and all undersigned counsel’s pleadings, the original complaint is factual and accurate to the best of undersigned counsel’s knowledge and belief and undersigned counsel would **never** disregard any order or directive by this Honorable Court or by any court.

4. Undersigned counsel would like to clarify the record while making the Honorable Court aware of the *actual* facts while providing a short update regarding Courts that seem to be applying reasoning similar to that which can be found in ECF 489.

5. Undersigned defense counsel, who is overwhelmed with new and old discovery, and a new Indictment, requests until tomorrow to file a 5 page 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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