

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
Plaintiff)	Criminal Case 21-CR-28
)	
v.)	Sentencing: August 31, 2023
)	
WILLIAM ISAACS)	Judge Amit P. Mehta
Defendant)	

UNOPPOSED MOTION TO EXTEND DEADLINES

Defendant William Isaacs, through undersigned counsel, hereby files an unopposed motion with this Honorable Court to extend the deadlines for the filing of Fed. R. Crim. P. Rule 29 and 33 motions in limine from May 8, 2023, to May 17, 2023. Furthermore, we respectfully ask that the United States and the Defendants have until June 9 and 23, 2023, by which to file a response and replies, respectively. The grounds for this motion are:

1. Neither counsel for the United States nor for any other remaining defendant opposes this motion for extensions;
2. Defendants Connie Meggs, Bennie Parker, and Sandra Parker join in this motion.
3. The main purpose of this motion is that trial counsel (Charles Greene and undersigned) have significant medical and professional commitments and scheduling challenges that warrant an extension of the deadlines.
4. The extensions will not prejudice any party; and
5. This motion is not made for purposes of delay.

Wherefore, we ask that the Court grant this motion.

Respectfully submitted,

/s/

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Counsel for Defendant William Isaacs

CERTIFICATE OF SERVICE

I hereby certify that the **UNOPPOSED MOTION TO EXTEND DEADLINES**
was filed with the Clerk of the Court via ECF on Saturday, May 6, 2023.

Respectfully submitted,

_____/s/_____
Gene Rossi, Esquire