

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	)	

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**MOTION TO EXTEND DEADLINE**

Defendant William Isaacs, through undersigned counsel, hereby files a motion with this Honorable Court to extend the deadline for the filing of his Fed. R. Crim. P. Rule 29 and 33 motions in limine from May 17 to May 23, 2023, *preferably until May 31*, because of medical issues *and the lack of complete transcripts*. Furthermore, we will abide by any deadlines, which are commensurately re-set by the Court, for a government response and our reply. The grounds for this motion are:

1. Connie Meggs joins in this motion, while the other co-defendants do not oppose.  
The United States opposes an extension to May 31, but has agreed to a deadline of May 23, as long as it can file a response by June 15;
2. The undersigned's trial counsel and his family have a recent and very severe case of COVID, which was confirmed on May 11, 2023;
3. On May 11, 2023, the undersigned had a medical appointment with his oncologist at Johns Hopkins Hospital in Baltimore, MD; and learned unexpectedly *yesterday* that he must have treatment there as part of a clinical trial

on May 15 and May 22, 2023. The treatment is expected to require travel and cause at least some fatigue, as well as re-scheduling on this and other matters;

4. The complete trial transcripts (voir dire through verdict (February 3 to March 20, 2023)) have been ordered, yet have not been received; and
5. This motion is not made for purposes of delay.

Wherefore, we respectfully ask this Court to grant the motion to extend the deadline for the filing of the Defendant's motions from May 17 to May 23, 2023, preferably until May 31. Last, the Defendant apologizes profusely to this Honorable Court and other parties for any inconvenience.

Respectfully submitted,

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/s/

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*Counsel for Defendant William Isaacs*

**CERTIFICATE OF SERVICE**

I hereby certify that the **MOTION TO EXTEND DEADLINE** was filed with the Clerk of the Court via ECF on Friday, May 12, 2023.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Gene Rossi, Esquire