

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

SANDRA RUTH PARKER,
BENNIE ALVIN PARKER,
CONNIE MEGGS,
LAURA STEELE,
WILLIAM ISAACS,

Defendants.

Case No. 1:21-cr-00028-APM

MOTION FOR EXTENSION OF TIME

Defendant Connie Meggs, by and through undersigned counsel, who has conferred with counsel for Defendants Sandra Ruth Parker, Bennie Alvin Parker, Laura Steele, and William Isaacs respectively moves this Court for an extension of time within which to file a joint reply in support of their motions for judgment of acquittal and/or motions for a new trial pursuant to Rules 29 and 33 of the Federal Rules of Criminal Procedure. Defendants respectfully request until July 14, 2023, to file their response, a request to which the government has consented.

On March 20, 2023, a jury found the Defendants guilty of various counts in the Indictment following a trial. On April 7, 2023, this Court issued an Order setting deadlines for post-trial briefing and related proceedings, including sentencing. (ECF No. 924). After several requests for extensions were granted by the Court, *see, e.g.*, Minute Order (May 15, 2023); Minute Order (June 9, 2023), Defendants' briefing was completed on or about June 8, 2023. Thereafter, after the Court granted an extension of time within which it was to be filed, Minute Order (June 13, 2023), the government filed an omnibus opposition on June 22, 2023. (ECF No. 950).

The Court's original scheduling order set the deadline for Defendants to file their combined reply brief two weeks after the government's original deadline to file its response, or on June 14, 2023. *See* Order (April 7, 2023) (ECF No. 924). No subsequent order, however, reset the deadline within which Defendants were to file their reply. Although two weeks following the government's submission of its omnibus response would be this Friday, July 7, 2023, Defendants respectfully request the Court allow an additional week, until July 14, 2023, to file their combined Reply. In addition to the original two-week period falling over the Independence Day Holiday, undersigned counsel has had to travel to Miami, Florida for two proceedings in the last two weeks, and begins a Bench Trial in this District on Monday, July 10, 2023, among other prior commitments. This will coincide with the date by which Defendants are to file their objections to the Draft Presentence Investigation Report of the United States Probation Officer and will enable defense counsel to confer and consolidate their briefing. And, again, the government does not oppose this request for a brief extension.

[SIGNATURE ON NEXT PAGE]

Dated: July 6, 2023

Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

Stanley E. Woodward, Jr. (D.C. Bar No. 997320)

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CERTIFICATE OF SERVICE

On July 6, 2023, the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which will automatically send electronic notification of such filing to all registered parties.

/s/ Stanley E. Woodward, Jr.

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