

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

UNITED STATES OF AMERICA)
)
 v.) CASE NO. 1:21-cr-00028-7-APM
)
 LAURA STEELE)
)
 _____)

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS**

Laura Steele, through undersigned counsel, respectfully requests a 60- day extension to file pretrial motions in the present matter. In support of this request, Ms Steele states the following:

1. Subsequent to the status conference held on 2 July, 2021, the Court issued an Order setting deadlines for pretrial motions that are not related to discovery to be filed by the defendants in this case. The Court provided the schedule of 2 September 2021 for defence motions, 30 September 2021 for government responses, and replies to be filed by 14 October. This was based on a projected trial schedule of 13 January 2022 and 4 April 2022.
2. A status hearing was held on 16 September, 2021. At that the status, the government provided the Court with information relating to the status of ongoing discovery. The parties agreed that based on the ongoing discovery situation the trial dates of January and April 2022 previously discussed appeared unrealistic. The Court set 11 July 2022 as a new projected trial date.
3. Due to the ongoing discovery process and the rescheduling of a projected trial date, counsel respectfully requests that this Court extend the time to file pre-trial motions for a period of 60-days until November 15, 2021. The government has already provided an enormous amount of electronic material to which, due to its volume, review and processing is extremely laborious and time-consuming. Moreover, the government indicates that more material is expected. Such an extension

will allow counsel the opportunity to engage in an appropriately thorough review of discovery. At that time, counsel anticipates being in a position to file any necessary and constitutionally effective pretrial motions on Ms Steele's behalf.

4. Counsel has communicated with Assistant United States Attorney Jeffrey Nestler who does not oppose this motion.

WHEREFORE, based on the forgoing, counsel for Laura Steele respectfully requests that this Court grant a grant a 60- day extension of the deadline for filing pretrial motions until November 15, 2021.

Respectfully Submitted,

/s/ Peter A. Cooper

Peter A. Cooper, (#478-082)
Counsel for Laura Steele
400 Fifth Street, NW.
Suite 350
Washington DC 20001
pcooper@petercooperlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Unopposed Motion for Enlargement of Time to File Pretrial Motions is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 20th day of September, 2021.

/s/ Peter A. Cooper

Peter A. Cooper