

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : CASE NO. 21-CR-37 (TNM)
 :
 :
 TIMOTHY LOUIS HALE-CUSANELLI, :
 :
 :
 Defendant. :

UNOPPOSED MOTION FOR EXTENSION OF DEADLINE TO FILE
GOVERNMENT'S RESPONSE

The United States, by and through its attorney, the United States Attorney for the District of Columbia, respectfully moves the Court for a one-week extension of the deadline to respond to Defendant Timothy Louis Hale-Cusanelli's Motion for Judgment of Acquittal and Motion for a New Trial. (ECF No 100.) The government's response to the defendant's motion is currently due 14 days from June 24, 2022, which is July 8, 2022. The government respectfully requests that the Court extend the response deadline to July 15, 2022.

The undersigned has conferred with counsel for the defendant regarding this motion. Counsel for the defendant does not object to this motion.

Respectfully submitted,

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By: /s/ Kathryn E. Fifield
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