

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES :
v.

: Crim. No. 21-85 (CRC)

JOHN STRAND :
v.

**UNOPPOSED MOTION TO EXTEND TIME TO
REPLY TO GOVERNMENT'S OPPOSITION TO
DEFENDANT'S MOTION TO DISMISS COUNTS**

Defendant, John Strand, through undersigned counsel, Stephen F. Brennwald, Brennwald & Robertson, in support of his Unopposed Motion to Extend Time to Reply to Government's Opposition to Defendant's Motion to Dismiss Counts, states as follows:

Defendant filed a motion to dismiss counts one, two, and three of the indictment.

The government submitted its lengthy and complex reply on July 28, 2022.

Defendant's Reply is due today, August 5, 2022.

Undersigned counsel, realizing the amount of work the reply, as well as the reply to the government's opposition to defendant's motion to change venue, would entail, reached out to the government on August 2, 2022, to inquire whether it would consent to defendant's request to extend the time to file his reply to this motion to Tuesday, August 9, 2022. Counsel hoped to be able to file the reply to the venue motion in a timely fashion (and still expects to do so).

The government replied that same day, and indicated that it did not oppose the

defendant's request. For some reason, counsel did not see the government's reply to counsel's August 2, 2022, email, and decided to do everything possible to submit his reply to this motion (the "1512" motion) by today, August 5, 2022.

Counsel, as of last night, August 4, 2022, still believed he could somehow prepare and submit both replies by today, and he cleared his entire Friday calendar from all previously-set appointments to make sure that could happen.

Unfortunately, one of counsel's clients in the Superior Court of the District of Columbia was arrested on a bench warrant on Thursday, August 4, 2022, and a hearing in that matter, which turned out to be a sentencing, was set for today, Friday, August 5, 2022, at 9:30.

Despite this unfortunate development (for the defendant, but also for counsel, given the deadlines in this case), counsel hoped that he could "get in and get out" of the 9:30 hearing set for this morning and get back to work on the replies.

Unfortunately, that has not happened, and counsel has literally been waiting for that case to be called (in the Superior Court for the District of Columbia) until now – 12:45 p.m.

Realizing that the lost hours of preparation – waiting for the Superior Court hearing to take place - cannot be made up in time to allow defendant to prepare and submit his response to the government's opposition to the 1512 motion, defendant is compelled to ask the Court to allow him a few more days to prepare his reply.

Counsel has been working feverishly to accomplish all of his tasks in all of his cases, working on multiple deadlines in multiple cases as rapidly as possible, but he simply will not be able to prepare a cogent and logical reply to the 1512 motion by

today.

Counsel does expect to be able to finish and file his reply to the government's opposition to defendant's motion to change venue by today.¹

WHEREFORE, for the foregoing reasons, as well as for such other reasons as may appear to this Court, defendant prays that the deadline to file his reply to the government's opposition to defendant's motion to dismiss be extended to Tuesday, August 9, 2022, and for any other relief this Court deems necessary.

Respectfully submitted,

Stephen F. Brennwald

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was sent by ECF, this 5th day of August, 2022, to all parties of record.

Stephen F. Brennwald

Stephen F. Brennwald

¹ Counsel has been working on the reply to the venue motion while sitting in court today for over three hours.