

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>CASE NO. 1:21-CR-00116 DLF</b>
	:	
<b>WILLIAM McCALL CALHOUN and</b>	:	
<b>VERDEN ANDREW NALLEY</b>	:	
	:	
<b>Defendants.</b>	:	

**UNITED STATES' UNOPPOSED MOTION TO EXTEND MOTION  
RESPONSE DEADLINE**

The United States hereby moves this Court for an extension of time to file its responses to the Defendant Nalley's Motion to Dismiss Count One of the Indictment (ECF 51) and Defendant Nalley's Motion to Suppress Statements (ECF 52), and in support of its motion states:

1. Defendant Nalley filed his motions on August 12, 2021. ECF 51 and 52.
2. On August 20, 2021, the United States filed an unopposed motion asking this Court to continue its response deadline for 30 days, or until September 23, 2021, while the parties attempted to negotiate a resolution to the case regarding Defendant Nalley. ECF 55. This Court granted the motion by way of minute entry on August 21, 2021.
3. Undersigned government's counsel took over the handling of this case matter and entered her appearance on September 7, 2021. ECF 58. That same day, this Court held a status conference and extended the government's response deadline to the Defendant's two motions until October 25, 2021. September 7, 2021 Minute Entry.
4. A status conference was held on October 5, 2021. At the conference, government's counsel explained that she had provided additional discovery to defendants and was seeking approval for a plea offer for Defendant Nalley. Undersigned counsel anticipates getting an offer to Defendant Nalley in the next seven to ten days. Upon information and belief,

it is highly likely that Defendant Nalley will find the plea offer acceptable, negating the need for additional briefing, as well as decisions from this Court related to the two motions.

5. Counsel for the Defendant Nalley has been contacted and he does not oppose the relief requested in this motion.

WHEREFORE, the United States respectfully requests that the Court grant an extension of time for the filing of its responses to Defendant Nalley's Motion to Dismiss Count One of the Indictment and Defendant Nalley's Motion to Suppress Statements until November 5, 2021.

Respectfully submitted,

CHANNING PHILLIPS  
Acting United States Attorney  
D.C. Bar No. 415793

By: /s/  
JENNIFER M. ROZZONI  
Assistant United States Attorney  
NM Bar No. 14703  
201 Third Street, NW, Suite 900  
Albuquerque, NM 87102  
505.350.6818  
jennifer.m.rozzoni@usdoj.gov