

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
WASHINGTON, D.C.

UNITED STATES OF AMERICA

v.

WILLIAM MCCALL CALHOUN, JR. and  
VERDEN ANDREW NALLEY  
*Defendants.*

CRIMINAL CASE NO.  
1:21-CR-00116-DLF

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**JOINT MOTION FOR AN EXTENSION OF TIME**  
**TO FILE PRETRIAL MOTIONS**

COMES NOW, Defendant, William McCall Calhoun, Jr., by and through undersigned counsel, Jessica N. Sherman-Stoltz, together with Assistant United States Attorney, Jennifer M. Rozzoni, and co-defense counsel, Thomas L. Hawker, and herby files this joint motion for additional time for the filing of pretrial motions.

(1)

On February 12, 2021, Messrs. Nalley and Calhoun were indicted on charges alleging obstruction of an official proceeding, unlawful entry into the Capitol, and disruptive conduct in the Capitol. (Doc. 1). The charges stem from the events of January 6, 2021.

(2)

On February 17, 2021, Mr. Nalley made his initial appearance in the Northern District of Georgia. On February 19, 2021, Mr. Nalley was released on bond. Mr. Calhoun was initially detained in Georgia, but on March 10, 2021, was released on bond conditions set in the District of Columbia. (Doc. 23).

(3)

On April 26, 2021, Mr. Nalley was arraigned in the District of Columbia, via Zoom, and pled not guilty. The Court adopted the bond conditions set in the Northern District of Georgia. Mr. Calhoun was arraigned on March 1, 2021.

(4)

On May 4, 2021, Mr. Nalley and his co-defendant Mr. Calhoun appeared, via Zoom, for a status conference before the Court. Most recently the parties appeared, again via Zoom, for a third status conference on September 7, 2021. At that hearing the Court set an extended deadline of September 28, 2021 for pretrial motions to be filed, and scheduled the next status hearing for October 5, 2021. The parties expected that before September 28<sup>th</sup>, defense counsel would have received their case specific discovery, and had time to review it and assess and file motions.

(5)

As of the date of this filing, the defendants have received a large amount of discovery pertaining to their specific cases. AUSA Jennifer Rozzoni has updated the parties that though there may not be much more unique discovery specific to the

defendants' cases, there will be a fair amount of global discovery yet to come. Undersigned counsel has not yet been able to review all of the Rule 16 discovery received on October 4, 2021, and consequently is filing this motion requesting additional time to completely review it, receive global discovery, strategize with the Defendant, discuss possible alternative resolutions, and file any necessary motions.

(6)

In consideration of the above, counsel requests that the Court extend the filing deadline for pretrial motions to November 29, 2021.

(7)

All parties have expressed their consent to join in this motion and request for an extension of time for pretrial motions.

WHEREFORE, the parties respectfully requests that the Court grant this joint motion and reset the filing deadline for pretrial motions to November 29, 2021.

A proposed Order is attached.

[Signatures on Next Page]

Respectfully submitted, this 27th day of October, 2021.

/s/ Jessica N. Sherman-Stoltz

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CERTIFICATE OF SERVICE

I hereby CERTIFY that on this the 27th day of October 2021, a true and correct copy of the foregoing *Joint Motion for an Extension of Time to File Pretrial Motions* with the Clerk of Court via the CM/ECF system, which will automatically send an email notification of such filing to all counsel of record.

/s/ Jessica N. Sherman-Stoltz  
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