

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

UNITED STATES OF AMERICA

v.

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

WILLIAM MCCALL CALHOUN, JR.
Defendant.

**DEFENDANT'S SECOND UNOPPOSED MOTION TO EXTEND THE REPLY
DEADLINE TO THE GOVERNMENT'S RESPONSE BRIEF**

COMES NOW, Defendant, William McCall Calhoun, Jr., by and through undersigned counsel, and without opposition of the Assistant United States Attorney, and herby files this motion to extend the reply deadline to the Government's response brief to Defendant's Motion to Dismiss Count One of the Superseding Indictment (ECF No. 110).

(1)

Defendant filed the above-noted motion on March 21, 2022 (ECF No. 101).

(2)

The Government filed its responses on April 25, 2022 (ECF No. 110).

(3)

The Speedy Trial Act has been tolled until the next status conference, currently scheduled for June 9, 2022.

(4)

Counsel for the United States does not oppose the relief requested in this Motion.

(5)

Counsel for Defendant was made aware on Monday, May 9, 2022, of the Honorable Judge Friedrich's May 4, 2022 opinion and order in *United States v. Reffitt*, No. 21-cr-32 (DLF), ECF No. 148 (D.D.C. May 4, 2022). In that opinion and order, Judge Friedrich denies the defendant's motion for a judgment of acquittal and to arrest judgment on his conviction for obstruction of an official proceeding in violation of 18 U.S.C. § 1512(c)(2). This is the same charge in which Mr. Calhoun has brought forth in his Motion to Dismiss Count One of the Superseding Indictment, and of which he presently is requesting an extension of time to reply to the Government's Response. *See* ECF No's 101 and 110. Having now read Judge Friedrich's opinion and order, counsel for Defendant would like to consider and address Judge Friedrich's opinion in Defendant's reply. The reply that counsel was prepared to file on May 9, 2022, gave no consideration to Judge Friedrich's recent ruling, and quite honestly, would have been a waste of this Court's time to read.

WHEREFORE, Defendant respectfully requests that the Court grant an extension of time for the filing of his reply to the Government's response to Defendant's Motion to Dismiss Count One of the Superseding Indictment until Sunday, May 22, 2022.

Respectfully submitted,
WILLIAM MCCALL CALHOUN

By counsel

/s/ Jessica N. Sherman-Stoltz

JESSICA N. SHERMAN-STOLTZ, ESQ.

VIRGINIA STATE BAR NO. 90172

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CERTIFICATE OF SERVICE

I hereby CERTIFY that on this the 10th day of May 2022, a true and correct copy of the foregoing *Defendant's Second Unopposed Motion to Extend the Reply Deadline to the Government's Response Brief* 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

Jessica N. Sherman-Stoltz, Esq.

Virginia State Bar #90172

Sherman-Stoltz Law Group, PLLC.