

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 1:21-CR-00116 DLF
v.	:	
	:	
WILLIAM McCALL CALHOUN,	:	
	:	
Defendant.	:	

UNITED STATES' UNOPPOSED MOTION TO EXTEND EXHIBIT DEADLINE

The United States respectfully moves this Court for an extension of time to provide its exhibit lists and binders to the Court. As grounds for its motion, the United States relies on the following:

1. On October 12, 2022, the Court set the instant case for a jury trial on January 17, 2023.
2. On November 3, 2022, the Court issued a Pretrial Order in anticipation of the January 17, 2023 trial date. ECF No. 133. The Pretrial Order set a deadline of December 13, 2022 for the parties to exchange exhibit lists. *Id.* at 3. The Pretrial Order also set a deadline of January 13, 2023 to furnish the Court with exhibit lists and binders with pre-marked exhibits. *Id.*
3. On December 15, 2022, subsequent to the Defendant's unopposed motion requesting a bench trial, the Court set a bench trial for February 1, 2023 and vacated the January 17, 2023 jury trial date.
4. Pursuant to the Pretrial Order, the government provided its exhibit list to the defense on December 13, 2022.
5. The government remains ready for trial on February 1, 2023. However, the January 13, 2023 deadline to provide exhibit lists/binders assumed a trial date of

January 17, 2023, ensuring the Court was provided the exhibits four days before trial. Trial has now been pushed to February 1, 2023. The government respectfully requests an extension to January 27, 2023,¹ ensuring that the Court has the exhibits five days in advance of trial—similar to the prior deadline.

6. The defense does not oppose the instant motion. Moreover, the government has already provided its exhibit list to defense, and therefore the defense would not be prejudiced by an extension to January 27, 2023.

WHEREFORE, the United States respectfully requests that the Court grant an extension of time to provide the Court with its exhibits lists and binders until January 27, 2023.

Respectfully submitted,

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¹ Email correspondence with Chambers suggests that trial may begin before February 1, 2023 as the Court must conclude trial by February 2, 2023. If the Court is inclined to grant the instant motion, and intends to begin trial prior to February 1, 2023, the government would modify its request so that that exhibit list/binder deadline is four calendar days in advance of the new trial date.

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