

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

**UNITED STATES OF AMERICA**

**v.**

**WILLIAM MCCALL CALHOUN, JR.**  
*Defendant.*

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

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**MOTION TO ACCEPT LATE FILING**

COMES NOW, Defendant, William McCall Calhoun, Jr., by and through undersigned counsel, and moves this Court, for good cause shown, for the entry of an order accepting Defendant's late filed *Reply to the United States' Post-Trial Brief*.

As grounds for this Motion, undersigned counsel states as follows:

1. By this Court's March 5, 2023 Order, post-trial briefs were to be filed by March 9, 2023, and replies to the post-trial briefs were to be filed by March 14, 2023.
2. On March 12, 2023, this Court then ordered the Government to file a supplementary brief by March 14, 2023.
3. Counsel for Defendant has been overwhelmed with other case related work since having coming back from Washington, DC in the evening of March 2, 2023. Including sixteen hearings last week, this Court's post-trial filing

deadline, and three other case related filing deadlines by this past Sunday at 11:59 PM. There has not been enough hours in each day to get everything done, and quite honestly, undersigned counsel got a late start drafting the Defendant's Reply to the United States' Post-Trial Brief.

4. Defendant's reply is being filed in the early morning hours of March 15, 2023, so it will be before this Court and opposing counsel by the start of everyone's day on March 15<sup>th</sup>.
5. The Government will not be prejudiced by this Court's acceptance of Defendant's late filed reply because they are not ordered to respond to the reply, and again, they will likely be seeing this reply at the same time they would have seen a reply filed at 11:59 PM on March 14<sup>th</sup>.

WHEREFORE, Defendant respectfully requests that this Court enter an order accepting the late filing of his *Reply to the United States' Post-Trial Brief*.

A proposed Order is included.

The Reply is included as exhibit A to this Motion.

Respectfully submitted, this 15th day of March 2023.

/s/ Jessica N. Sherman-Stoltz  
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CERTIFICATE OF SERVICE

I hereby CERTIFY that on this the 15<sup>th</sup> day of March 2022, a true and correct copy of the foregoing *Motion to Accept Late Filing* was filed 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.