

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	No. 21-cr-117-1 (TFH)
	:	
RYAN NICHOLS,	:	
	:	
Defendant.	:	

**CONSENT MOTION FOR TO CONTINUE BY ONE DAY THE PARTIES’
DEADLINE TO FILE A JOINT NOTICE REGARDING DETENTION HEARING**

In preparation for the December 20, 2021, hearing on defendant Ryan Nichols’s bond motion (ECF 55), the Court ordered the parties to file a joint notice by Monday, December 13, 2021, indicating:

- (1) a list of any witnesses who will testify;
- (2) a list of exhibits, clearly identified according to the same numbering scheme presented in each parties' respective briefing, including video exhibits, that each party intends to present at the hearing, identifying the specific portions of any video(s) to be played at the hearing; and
- (3) a statement of how much time each side is requesting for argument and presentation of evidence.

Dec. 7, 2021 Minute Order. With the consent of defense counsel, the government moves the court to extend by one day the deadline for filing the joint notice described above. In support of this motion, the government states as follows.

Defendant Nichols’s reply in support of his bond motion is due December 13, 2021. To ensure that the government has an opportunity to review any reply brief filed by the defendant before finalizing a list of exhibits to present at the hearing, the government respectfully requests a one-day extension of the deadline to file the joint notice.¹ On December 8, 2021, the government

¹ At this time, the government does not intend to call any witnesses at the hearing, and the government anticipates requesting 60 minutes for its argument and presentation of evidence.

solicited defense counsel's position on this requested relief. On December 10, 2021, defense counsel indicated that he consented and "actually would suggest a few more days."

For the foregoing reasons, the government requests the Court extend by at least one day, until December 14, 2021, the deadline to file the joint notice contemplated in the Court's December 7, 2021 Minute Order.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

/s/ Luke M. Jones

LUKE M. JONES
VA Bar No. 75053
Assistant U.S. Attorney
555 4th Street, N.W.
Washington, D.C. 20530
(202) 252-7066
Luke.Jones@usdoj.gov

/s/ Danielle Rosborough

Danielle Rosborough
D.C. Bar No. 1016234
Trial Attorney, National Security Division
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530
202-514-0073
Danielle.Rosborough@usdoj.gov