

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

UNITED STATES,

v.

RYAN TAYLOR NICHOLS

Defendant.

)
)
)
) Case No. 21-cr-117-1(TFH)
)
)
)
)
)
)

**UNOPPOSED MOTION FOR EXTENSION OF DEADLINE FOR SUPPLEMENTS AND
FOR CONTINUANCE OF HEARING**

To the HONORABLE COURT: Defendant Nichols requests an extension of the deadline to file a supplement to his Motion for Pretrial Release and a continuance of the hearing scheduled before this Court on October 25, 2022.

On October 7, 2022, the Court set a deadline for supplements to be filed by October 21, 2022, and reset the hearing on the Motion for October 25, 2022.

Undersigned counsel for Defendant Nichols was scheduled to visit the prison after the Jewish holidays, which went from October 9 – October 18, to confer with Defendant Nichols in person to prepare the supplements and to prepare for the hearing, but the plans were canceled due to a breakout of COVID-19 in the jail where Nichols is detained.

Defendant Nichols is himself experiencing severe COVID-19-like symptoms. Thankfully, he has tested negative, but he is severely under the weather and in no condition to assist in preparing the supplement or for the hearing. Further, given his current condition and the ongoing outbreak in the prison, it will be impossible for him to appear at the hearing on Tuesday, October 25.

Accordingly, Defendant Nichols respectfully requests that the Court grant an extension to file a supplement until October 28.

Undersigned counsel communicated via email with counsel for the Government and they do not oppose the extension or a continuance of the hearing. The parties conferred and both parties would be available of a rescheduled hearing on November 3. If November 3 does not work with the Court's schedule, the parties are also available on November 4 or 8.

WHEREFORE, Defendant Nichols respectfully asks this court to grant an extension to file a supplement by October 28, and to reset the hearing accordingly.

Dated: October 20, 2022

Respectfully Submitted,

/s/Jonathan Gross
Bar ID: MD0162
2833 Smith Ave. Suite 331
Baltimore, MD 21209
(443) 813-0141
jon@clevengerfirm.com

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on October 20, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, with consequent service on all parties.

/s/Jonathan Gross