

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

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

**MOTION FOR EXTENSION OF
TIME**

Defendant Ryan Nichols, by and through undersigned counsel respectively moves this Court for an extension of time of three (3) business days within which to file a reply to the Government’s response to the defense motion for disclosure of exculpatory information. The Government has no objections to this request. This request would make the reply due July 12, 2023.

Undersigned counsel learned upon his arrival overseas (last night) that he can no longer access evidence.com because he is now “geo-limited.” In order to determine whether a reply is necessary and prudent, undersigned counsel must acquire access to evidence.com. In the interim, undersigned counsel was also contacted by two reporters, Joseph Hanneman and Steven Baker, who provided new information about a Metropolitan Police Department

supervisor who has featured prominently in prior defense motions. Undersigned counsel would appreciate the opportunity to evaluate this new information with access to evidence.com so that he can determine if it should appropriately included in the reply.

Undersigned counsel attempted and failed to file this from his overseas location and has accordingly requested that Mr. McBride file on his behalf.

Dated July 7, 2023

Respectfully submitted,

/s/ Bradford Geyer
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CERTIFICATE OF SERVICE

I hereby certify on this 7th day of July 2023, a copy of the foregoing was served upon all parties as forwarded through the Electronic Case Filing (ECF) System.

/s/ Brad Geyer
Bradford L. Geyer