

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

UNITED STATES OF AMERICA,

V.

Case No. 21-CR-00118-RCL-1

ERIC GAVELEK MUNCHEL,)

Defendant.)

**DEFENDANT’S UNOPPOSED MOTION FOR AN EXTENSION OF TIME WHEREIN
TO FILE PRETRIAL MOTIONS**

COMES NOW the Defendant, Eric G. Munchel (Mr. Munchel), by and through undersigned counsel, and respectfully tenders his unopposed motion for an extension of time wherein to file pre-trial motions pursuant to Fed. R. Crim. P. 12(c)(2) and in support thereof states as follows:

1. On December 2, 2022, this Court made and entered its order via minute entry setting the deadline for the filing of pretrial motions in this case as February 15, 2023.
2. Since that time, new Counsel has been appointed to represent the Government in this case.
3. Communication with the incoming attorneys for the Government has involved the potential of finding a resolution to this matter by plea agreement.
4. Said plea negotiations have not been concluded as of the date of this motion and will not be concluded by the deadline for pretrial motions set by this Court.
5. It has been the general policy of the United States Attorneys Office that once a motion has been filed in a case requiring a substantive response, plea negotiations are concluded.

6. Counsel for the Defendant has consulted with the attorneys for the Government, and they have raised no objection to Defendant's motion for an extension of time.

WHEREFORE Defendant respectfully prays this Court make and enter its Order granting an extension of time wherein to file pretrial motions and for such other and further relief as this Court shall deem just and proper on the premise.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gall", is positioned above the printed name and contact information of the attorney.

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of February 2023, I filed the foregoing Motion for an Extension of Time and a proposed Order by the Court's CM/ECF system. All case registered parties will be served by CM/ECF.

A handwritten signature in black ink, appearing to read "J. Allen", is positioned above a horizontal line.

Joseph W. Allen