

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

UNITED STATES OF AMERICA

v.

**WILLIAM POPE, and
MICHAEL POPE,**

Defendants.

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Case No. 21-cr-128 (RC)

**GOVERNMENT’S MOTION FOR EXTENSION OF TIME
TO FILE ITS SUPPLEMENTAL MOTION REGARDING THE DECLARATION OF
THE UNITED STATES CAPITOL POLICE AND THE PROTECTIVE ORDER**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully requests an extension of time in which to file its supplemental motion in support of the United States Capitol Police (“USCP”) Declaration of Thomas A. Dibiase, ECF No 88. The government requests a one-week extension until March 24, 2023, to file its response. Undersigned counsel did not receive a finalized version of the USCP Declaration until March 15, 2023, and misunderstood the Court’s order to mean that, while the declaration was to be filed by March 17, 2023, the supplemental motion was to be filed one week later (on March 24, 2023). Instead, the transcript and Order reflect that the defendant’s response to the Declaration is to be filed by March 24, 2023. For these reasons, the government respectfully requests one additional week leave to file its opposition/supplement, understanding that the defendant may need additional time to respond to our filing. Given the need for accuracy and more fulsome briefing on the issues raised by the defendant (and inquired by the Court), we apologize

for the delay, but request a short enlargement of the applicable deadlines. The government will, however, submit the USCP Declaration on or before March 17, 2023.

Undersigned counsel has conferred with the defendant, *pro se*, regarding this motion, and he opposes the request.

Respectfully submitted,

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/s/ Kelly E. Moran
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