

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

UNITED STATES OF AMERICA,

v.

WILLIAM ALEXANDER POPE,

Defendant.

Case No.: 1:21-cr-00128-RC

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**UNOPPOSED MOTION FOR PERMISSION TO FILE OPPOSITION TO  
GOVERNMENT’S CROSS-MOTION BY AUGUST 24, 2023**

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I respectfully request the Court’s permission to file opposition by August 24, 2023, to the government’s cross-motion to modify the protective order, ECF No. 130. I have conferred with the government on this request, and the government does not oppose.

Previously, I did not oppose the government’s motion (ECF No. 128) for an extension of time to respond to ECF No. 127, which was my motion to compel the government to produce all discovery items I am allowed to possess under the protective order (which the government promised the Court they would do in ECF No. 104). That extension of time allowed the government 21 days to respond, and I ask an equal 21 days to respond to their cross-motion since the government is now motioning the Court to modify the protective order in a way that would make my January 6 protective order the most restrictive of any January 6 defendant (even though I have fully complied with the current order) and would prevent me from possessing even non-sensitive discovery materials for use in my defense. Since the government’s cross-motion is an egregious attack on fundamental defendant rights, I need to respond.

Furthermore, there are a number of outstanding discovery requests that the government has not yet fulfilled. Ms. Moran has told me that the government intends to provide a deliverable sometime this week, which could affect the content of my response to the government's cross-motion. [However, since the government repeatedly failed to live up to their 'this week' delivery promises before ultimately breaking their commitment from ECF No. 104 to provide me with a copy of all discovery I am allowed to possess, it is also possible that I will need to file an additional motion to compel the government to provide these requested items].

With these factors in mind, a deadline of August 24, 2023, to respond to the government's cross-motion is justified, and I so move.

Respectfully submitted to the Court,

By: William Pope

/s/

William Pope

Pro Se Officer of the Court

Topeka, Kansas

Certificate of Service

I certify that a copy of this was filed electronically for all parties of record on August 9, 2023.

/s/

William Alexander Pope, Pro Se