

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES)

v.)

Sahady)
_____)

Case No. 1:21-cr-134

DEFENDANT’S UNOPPOSED MOTION TO EXTEND TIME TO FILE A
MOTION FOR BILL OF PARTICULARS

TO THE COURT:

The Defendant Mark Sahady, through counsel, seeks to extend the time to file a Bill of Particulars..

1. On October 19, 2023, the Court issued a pretrial scheduling order.
2. Pursuant to the Order, a Motion for Bill of Particulars shall be filed on or before October, 20, 2023.
3. On October 19, 2023, Counsel for the Defendant conferred with the Government regarding a Motion to extend the time to file a Bill of Particulars, and any responses and replies, for one week.
4. The Government does not oppose the Motion.
5. Counsel for the parties also discussed and agreed upon a briefing schedule to suggest to the Court; Defendant’s Motion for Bill of Particulars is due by October 27, 2023; Government’s Brief in Response is due by November 10, 2023; and the Defendant’s Brief in Reply is due by November 17, 2023.

WHEREAS the Defendant seeks an extension to file a Motion for Bill of Particulars, and whereas the Government does not oppose the extension, the Defendant respectfully requests that the Court extend the time for the Bill of Particulars to be due by October 27, 2023, the Government's Brief in Response to be due by November 10, 2023, and the Defendant's Brief in Reply to be due by November 17, 2023.

Dated: October 20, 2023

Respectfully submitted,

/s/ Jonathan Gross

Jonathan Gross, Esq.

BAR ID: MD 0126

2833 Smith Ave, Suite 331

Baltimore, MD 21209

(443) 813-0141

jonathansgross@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being served on opposing counsel via email on

October 20, 2023

/s/ Jonathan Gross