

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-153 (RBW)
	:	
	:	
DANIEL GOODWYN	:	
	:	
Defendant.	:	

**UNITED STATES’ MOTION TO ACCEPT GOVERNMENT’S LATE-FILED  
RESPONSE TO DEFENDANT’S MOTION TO DISMISS**

The United States of America hereby respectfully requests the Court accept its response (attachment one) to “Defendant’s Motion to Dismiss Count One of the Indictment for Failure to State an Offense, with Memorandum of Law.” The deadline to file a response to was October 14, 2022. The deadline to file motions in limine was September 30, 2022, and “their oppositions to any such motions on or before October 28, 2022.” Counsel for the government mistakenly thought the October 28, 2022, deadline was for all responses. This was error. Counsel for the government was alerted to this error by counsel for Defendant Goodwyn on October 24, 2022, and filed leave with its response the same day (attachment one). Counsel have conferred and the defendant does not take a position on this motion.

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney

By: /s/ Brian Brady  
Brian Brady  
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Attachment:

1. Government's Opposition to Defendant Daniel Goodwyn's Motion to Dismiss Count One of the Indictment for Failure to State an Offense.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 24, 2022, I caused a copy of the foregoing motion to be served on counsel of record via electronic filing.

*/s/ Brian Brady* \_\_\_\_\_  
Brian Brady  
Trial Attorney