

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	Criminal No. 21-190 (DLF)
v.)	Judge Friedrich
)	Motions Hearing: June 27, 2023
ZACHARY ALAM)	

UNOPPOSED MOTION TO EXTEND REPLY DEADLINES

COMES NOW the defendant, Zachary Alam, by and through undersigned counsel, and respectfully moves this Honorable Court to extend the defense deadline for filing replies to the government's oppositions to defense pretrial motions and the government's deadline for filing its reply to Mr. Alam's opposition to its motion in limine. Specifically, Mr. Alam moves the Court to extend these deadlines from May 19, 2023 to June 5, 2023. In support of this motion, Mr. Alam would show:

1. Currently, defense replies to government oppositions to defense pretrial motions and the government's reply to the defense opposition to its motion in limine are due on May 19, 2023.
2. At the time the above-referenced deadline was set, the motions hearing in this case was scheduled for May 31, 2023. However, per Mr. Alam's request, that hearing was continued to June 27, 2023.
3. Due to the press of business, undersigned counsel is having difficulty finishing his replies to the government's oppositions to his pretrial motions by the May 19, 2023 deadline. Most notably, counsel has a brief due in United States Court of Appeals for the District of Columbia Circuit that is due on May 31, 2023 and that is taking up counsel's time. Accordingly, counsel is requesting that the deadline for Mr.

Alam to reply to the government's oppositions to his pretrial motion be extended to June 5, 2023.

4. Undersigned counsel has consulted with Assistant United States Attorney Rebeka Lederer. Ms. Lederer has graciously indicated that the government does not oppose a motion by Mr. Alam to extend the defense deadline for filing replies to the government's oppositions to defense pretrial motions to June 5, 2023—provided that the government's deadline for filing its reply to Mr. Alam's opposition to its motion in limine be similarly extended. This seems only fair.

CONCLUSION

WHEREFORE, the defendant, Zachary Alam, moves this Honorable Court to extend the defense deadline for filing replies to the government's oppositions to defense pretrial motions and the government's deadline for filing its reply to Mr. Alam's opposition to its motion in limine from May 19, 2023 to June 5, 2023.

Respectfully submitted,

/s/

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