

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

RYAN SCOTT ZINK,

Defendant.

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Case No. 1:21-cr-191 (JEB)

UNOPPOSED MOTION TO CLARIFY OR, ALTERNATIVELY, EXTEND  
THE DUE DATE FOR THE GOVERNMENT’S RESPONSE TO  
DEFENDANT’S PRETRIAL MOTION

The United States of America respectfully requests that the Court clarify or, in the alternative, extend the date by which the government must respond to the defendant’s “motion for disclosure of all undercover agents, Antifa activists, and confidential human sources within the sphere of defendants [sic] alleged conduct,” which was filed on June 6, 2023 (ECF No. 51). On April 4, 2023, the Court ordered that the parties file (i) any motion *in limine* by June 12, 2023; (ii) any response to those motions *in limine* by July 3, 2023; and (iii) any reply by July 17, 2023. On June 6, 2023, as noted, the defendant filed a “motion for disclosure of all undercover agents, Antifa activists, and confidential human sources within the sphere of defendants [sic] alleged conduct.” (ECF No. 51). Because the defendant’s motion does not appear to be a motion *in limine*, out of an abundance of caution, the government respectfully requests that the Court clarify that the deadline for the government’s response to this motion, too, is July 3, 2023—the same date as for the motions *in limine* filed in this case.

In the alternative, the government respectfully requests that the Court extend the due date for the government’s response to this motion to and including July 3, 2023. Good cause would exist for such an extension because, in addition to this case, since the defendant’s motion was filed

on June 6, I have been and will be responsible for several competing professional obligations, including the following:

- I prepared a draft of the government's brief in opposition to certiorari in *Eric Grzywinski v. United States*, No. 22-7237 (U.S.), which is due on or before July 3, 2023; and
- I have been engaged in pretrial and trial preparations in *United States v. David Lesperance et al.*, No. 21-cr-575-JDB (D.D.C), which is set for trial on July 10, 2023.

Counsel for the defendant, per Roger Roots, has advised that the defendant does not oppose the relief sought in this motion.

Accordingly, the government respectfully requests that the Court grant this motion and that the due date for the government's response to the defendant's pending motion (ECF No. 51) be set for July 3, 2023.

Dated June 20, 2023.

Respectfully submitted,

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