

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 )  
 v. )  
 )  
 THOMAS WEBSTER, )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

Criminal No. 21-cr-208 (APM)

**AFFIDAVIT**

STATE OF NEW YORK )  
 )ss.:  
 COUNTY OF ORANGE )

JAMES E. MONROE, ESQ., being duly sworn deposes and says:

1. That your affiant has the privilege of representing the defendant Thomas Webster.

2. That on March 1, 2022 this Honorable Court entered a Second Amended Pre-Trial Order directing that motions in limine be filed with the Court on or before March 14, 2022. On the evening of March 14th, the Government filed five (5) motions in limine denominated as:

1. To preclude or limit cross-examination of Officer [N.R.] and exclude evidence;
2. To limit cross-examination of Secret Service Agency witnesses;
3. To exclude improper character evidence;
4. To exclude evidence pertaining to an unidentified female rioter; and
5. To preclude claims of self-defense, necessity, justification, and duress and to exclude evidence in support thereof.

3. The Court's current order requires that defendant's opposition papers be filed on

or before March 21, 2022. Given the number of motions and their complexity, counsel will not have sufficient time to respond.

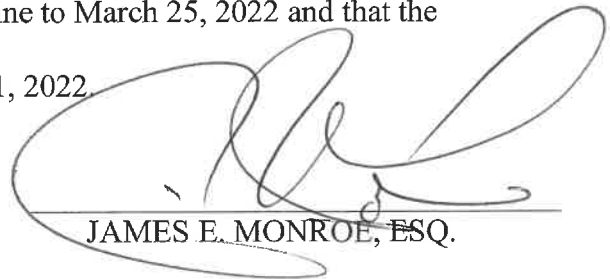
4. Your affiant spoke with AUSA Katherine Nielsen and Brian Kelly on March 17th who have graciously consented to extending defendant's request. Commensurate with this application, it is requested that the Government's time to reply be extended to April 1, 2022.

5. The Government's motions strike at the heart of defendant's defense(s). The Court's decision concerning these motions will dramatically alter the trajectory of Mr. Webster's trial. That being said, your affiant is seeking a full and fair opportunity to competently respond.

6. Fed. R. Crim. Proc. 47(c) requires a party to submit such an application "at least seven (7) days before the hearing date . . .". Pre-Trial Hearings are scheduled to take place before this Court on April 21, 2022.

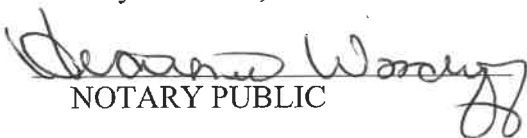
7. The proposed extension of time(s) does not otherwise alter the Court's March 1<sup>st</sup> Pre-Trial Order.

8. Based on the above, defendant is requesting that the Court extend his time to oppose the Government's pre-trial motions in limine to March 25, 2022 and that the Government's time to reply be extended to April 1, 2022.



JAMES E. MONROE, ESQ.

Sworn to before me this  
17<sup>th</sup> day of March, 2022



NOTARY PUBLIC

HEATHER WOODRUFF  
Notary Public, State of New York  
No. 01WO4769888  
Qualified in Orange County  
Commission Expires March 30, 2022