UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

: CRIMINAL NO. 21-cr-00216 (JDB)

v.

:

LEO BRENT BOZELL IV

.

Defendant.

UNITED STATES' UNOPPOSED MOTION FOR EXTENSION OF TIME

The United States of America respectfully submits this motion for an extension of time to file a memorandum in opposition to defendant Leo Brent Bozell IV's motion to dismiss (Dkt No. 33).

At a status hearing on November 16, 2021, the Court ordered that the defendant's motion to dismiss be filed by December 16, 2021; that the government's memorandum in opposition be filed by January 7, 2022; and that the defendant's reply brief be filed by January 21, 2022. The Court also scheduled a status hearing for January 27, 2022. (Minute Order, November 16, 2021.)

A brief extension of time for the government to file its memorandum is opposition, to January 10, 2022, is appropriate. The motion to dismiss is around 45 pages long and raises numerous legal issues. Counsel for the United States was away from his office for a period of time after the motion to dismiss was filed due to a medical issue, and holiday and weather-related issues in Washington, D.C., have caused further delay. A brief extension of three days will cause no prejudice. The defendant has no objection to the requested extension, and agrees that it would be appropriate to also extend the due date for the reply brief by three days.

For these reasons, the United States respectfully requests an order extending the time for the government to file its memorandum to January 10, 2022; and for the defendant to file his reply brief to January 24, 2022.

Respectfully submitted,

MATTHEW M. GRAVES United States Attorney D.C. Bar No. 481052

By: <u>/s/</u>

Michael J. Friedman
Assistant United States Attorney
NY Bar No. 4297461
555 4th Street, N.W., Room 11-439
Washington, D.C. 20530
202-252-6765
Michael.Friedman@usdoj.gov

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PROPOSED ORDER

Having considered the United States of America's motion for an extension of time, and finding that there is good cause to grant the motion, and finding that there is no opposition to the requested relief;

It is hereby ORDERED that the motion be, and hereby is, GRANTED.

The United States' memorandum in opposition to the motion to dismiss (Dkt No. 33) is due to be filed on or before January 10, 2022; and defendant Leo Brent Bozell IV's reply brief in support of his motion is due to be filed on or before January 24, 2022.

IT IS SO ORDERED.

The Hon. John D. Bates
United States District Judge