

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES

:

v.

: Crim. No. 21-CR-291-1 (ABJ)

THOMAS F. SIBICK

:

CONSENT MOTION TO EXTEND MOTIONS DEADLINES

Defendant, Thomas F. Sibick, through undersigned counsel, Stephen F. Brennwald, Brennwald & Robertson, in support of his Consent Motion to Extend Motions Deadlines, states as follows:

1. At a hearing on August 17, 2022, this Court ordered the defendant to file any 12(b)(3) motions by September 30, 2022. The Court also ordered the government to provide notice of any intent to use 404(b) evidence, or to introduce evidence of any prior convictions, by the same date.
2. At a hearing on September 16, 2022, the Court set a further status conference for October 24, 2022.
3. Because the parties are still attempting to resolve this case short of trial, it would conserve resources to extend the deadlines listed above. The preparation of 12(b)(3) motions in January 6 cases is extremely time-consuming, and will not be necessary if the parties are able to dispose of this case short of trial.
4. The government consents to this motion, as it also would need to file one or more documents by September 30, 2022 (tomorrow) if these deadlines are not extended during the parties' plea negotiations.

WHEREFORE, for the foregoing reasons, as well as for any other reasons that may appear to this Court, defendant asks this Court, with the consent of the United States, to vacate

the September 30, 2022, motions deadline, not to set any further dates with respect to the motions described above until and unless the parties are unable to reach an agreement, and for any other relief this Court deems just and proper.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was sent by ECF, this 29th day of September, 2022, to all parties of record.

/s

Stephen F. Brennwald