

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

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**UNITED STATES OF AMERICA**

v.

**SARA CARPENTER,**

**Defendant.**

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**Criminal No. 21-CR-305 (JEB)**

**DEFENDANT’S CONSENT MOTION FOR AN EXTENSION OF TIME TO  
FILE POST-TRIAL MOTIONS**

The defendant hereby moves this Court to grant an extension of time to file post-trial motions pursuant Rules 29 and 33. In support of its motion, the defendant states as follows:

**FACTUAL BACKGROUND**

On March 9, 2023, jury trial in this matter concluded with a verdict of guilty on all counts. The jurors were discharged, Ms. Carpenter was continued on personal recognizance bond, and sentencing was set for July 14, 2023.

In preparation for potential written motions pursuant to Rules 29 and Rule 33 of the Federal Rules of Criminal Procedure, defense counsel has since ordered the trial transcript. The court reporter’s office has advised that the transcript will not be ready for at least two weeks. Defense counsel has notified the government of our intent to move for an extension of time to file any post-trial motions so that counsel can review the trial transcript for the purpose of identifying and preparing such motions. Specifically, counsel proposed that after it received and has an opportunity to review the transcripts, the parties would confer and propose a joint

briefing schedule to the Court. The government stated it agreed with the proposal and consents to the request.

### **ARGUMENT**

After the government rested on March 8, 2023, the Court heard and denied the defendant's oral motion for Judgment of Acquittal pursuant to Rule 29(a). Pursuant to Rule 29(c), a defendant may move for a judgment of acquittal, or renew such a motion, within 14 days after a guilty verdict or after the court discharges the jury, whichever is later. Rule 33 provides the same time frame for the defendant to file a motion for a new trial. *See* Fed. R. of Crim. Proc. Rule 33(a), (b)(2).

To make an intelligent assessment as to whether either or both motions should be filed, and to prepare the motions in an effective manner, defense counsel requires an opportunity to review the transcript of Ms. Carpenter's trial. Based on counsel's discussions with the court reporter's office, counsel does not expect to receive the transcript by March 23, 2023 (this Thursday), much less to have sufficient time to review it and prepare a written motion. Moreover, in light of counsel's extensive caseload and competing work obligations, counsel will need additional time after receiving the transcript to review it, assess whether motions should be filed, and prepare and file the motions.

Defense counsel has conferred with the government and the government consents to the requested extension and proposal to submit a joint briefing schedule after the defense has received the trial transcript.

WHEREFORE, the defendant respectfully requests that this Court grant the motion for an extension of time to file post-trial motions until defense counsel receives the trial transcript and

thereafter proposes a joint briefing schedule for the motions a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,

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**ORDER**

Based upon the representations in the Defendant’s motion for an extension of time to file post-trial motions, and upon consideration of the entire record, the Court makes the following findings:

Due to the defendant’s need to obtain and review the trial transcript before assessing and preparing any post-trial motions, the requested extension is necessary to allow a reasonable time for effective preparation of any written post-trial motions. The Court will grant defense counsel the opportunity to propose a joint briefing schedule upon receiving and reviewing the trial transcript.

Therefore, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2023,

**ORDERED** that the Defendant's Motion for an to Extension of Time to File Post-Trial Motions and for leave to submit a proposed joint briefing schedule is hereby GRANTED.

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THE HONORABLE JAMES E. BOASBERG  
UNITED STATES DISTRICT JUDGE