

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
)
 v.) No. 21-453 (JDB)
)
 SEAN MCHUGH,)
)
 Defendant.)
 _____)

UNOPPOSED MOTION FOR EXTENSION TO FILE REPLY

Defendant, Sean McHugh, through counsel, respectfully requests that the Court grant a one week extension to allow Mr. McHugh to file a reply to the government’s opposition to his second motion to dismiss. *See* ECF No. 57. Below are the reasons in support:

- (1) Based on a new ruling on March 7, 2022, where Judge Nichols granted a motion to dismiss 18 U.S.C. §1512(c)(2), Mr. McHugh filed a second motion to dismiss asking this court to reconsider its earlier ruling based on the arguments raised in the *Miller* decision. *See* ECF 54 (citing *United States v. Miller*, No. 21-cr-119, ECF No. 72, Memorandum Opinion).
- (2) The government filed an opposition to McHugh’s second motion to dismiss raising an argument not initially addressed in earlier briefings in similar cases where other defendants raised the same argument in support of dismissal. *See* ECF No. 57.
- (3) After researching this new argument, undersigned counsel needs one additional week to properly address the government’s opposition.
- (4) Undersigned counsel discussed this with government counsel, who does not oppose the requested extension.

Conclusion

For these reasons, Mr. McHugh respectfully requests that the Court grant this motion for a one week extension to file a reply to the government's opposition to McHugh's second motion to dismiss.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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