

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

KENNETH JOSEPH OWEN THOMAS,

Defendant

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Criminal Case No.

1:21-cr-00552 (CRC)

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**MOTION OF KENNETH JOSEPH OWEN THOMAS'S**  
**FOR EXTENSION OF TIME TO FILE JURY INSTRUCTIONS "REDLINE"**

Defendant KENNETH JOSEPH OWEN THOMAS ("Thomas"), through the undersigned counsel, John L. Pierce, Esq. hereby moves this Court for an extension of time to file his proposed jury instructions with redlined comparisons until Monday morning.

The parties' proposed formatting and conception of the jury instructions is so different that it is difficult for the Defendant to finalize the formatting of the jury instructions and compare them with the Government's version as in a redline.

Defendant is emailing a WORD version of the attached work in progress to both the Court's clerk as instructed and to the Government's Assistant U.S. Attorneys of record in this case.

Dated: March 16, 2023

Respectfully Submitted,

/s/ John M. Pierce  
John M. Pierce  
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*Attorney for Defendant*

### CERTIFICATE OF SERVICE

I, John Pierce, hereby certify that on March 16, 2023 I caused an exact copy of this document to be sent via this Court's electronic filing system, to every attorney of record in this case.

/s/ John Pierce      March 16, 2023