

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

UNITED STATES OF AMERICA,)	
)	
V.)	CRIMINAL NO. 21-CR-28-APM
)	
BRIAN ULRICH,)	
)	
Defendant.)	

UNOPPOSED MOTION FOR ADDITIONAL TIME TO FILE MOTIONS

COMES NOW DEFENDANT BRIAN ULRICH, by and through counsel, who respectfully requests that the Court grant him additional time to file motions. Indicted in the Fifth Superseding Indictment (Doc. 328), dated August 4, 2021 and unsealed on August 9, 2021, Mr. Ulrich was arraigned on August 13, 2021. After his arraignment, Mr. Ulrich filed a Motion for additional time to file motions, which was granted by the Court. The Government continues to provide additional discovery, which requires considerable time to review. Therefore, Mr. Ulrich respectfully requests an extension of time in which to file motions until December 2, 2021. Mr. Ulrich has no objection to the continued exclusion of time from the Speedy Trial calculation. Counsel for the Government does not object to this request.

Respectfully submitted,

A. J. Balbo

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of November, 2021, a true and accurate copy of the foregoing was electronically filed and served via the Court's CM/ECF system to all counsel of record.

Respectfully submitted,

/s/ A. J. Balbo

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