

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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

**CONSENT MOTION FOR ADDITIONAL TIME  
TO FILE PRETRIAL MOTIONS (THIRD REQUEST)**

COMES NOW Brian Ulrich, by his undersigned counsel, and respectfully moves this Honorable Court to extend the time for filing pretrial motions to January 6, 2022. This is the third request for an extension of the motions’ deadline. AUSA Edwards consents to this request. The reasons for the request are the following:

1. Discovery in the case is voluminous and continues to be produced.
2. Motions to be filed in this case involve complex and novel legal issues that require substantial time to research and prepare and cannot be completed without review of the discovery.
3. The Government has just filed a Sixth Superseding Indictment.
4. Despite due diligence, counsel has been unable to review all the discovery, fully research the issues ,and prepare the necessary motions.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of December, 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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