

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : **CASE NO. 21-cr-719 (JEB)**
 :
 :
 CYNTHIA BALLENGER, and :
 CHRISTOPHER PRICE, :
 :
 :
 Defendants. :

UNITED STATES' UNOPPOSED MOTION FOR EXTENSION OF TIME

The United States of America respectfully submits this motion for an extension of time of seven days for filing pretrial response motions, as well as a correlating seven day extension for filing pretrial reply motions.

At a status hearing held on May 20, 2022, the Court ordered that the parties' pretrial submissions be filed by July 20, 2022; that the responses be filed by August 17, 2022; and that the replies be filed by September 7, 2022. The Court also set the date for a jury trial beginning on December 5, 2022 (Minute Order, May 20, 2022).

A brief extension for the government to file its responses to the defendants' motions is appropriate.¹ Defendants filed several substantive pretrial motions on July 20, 2022 and July 22, 2022. *See* ECF Nos. 54, 55, 56, 57. These motions are lengthy—exceeding 100 pages combined—and raise numerous legal issues. Although undersigned counsel has made her best efforts to timely respond to the motions, undersigned counsel for the United States was away from her office for a period of time after the motions were filed due to a family medical issue, and thus requires additional time to respond to the various motions. A brief extension of seven days will cause no prejudice, and defense counsel has represented that defendants do not oppose

¹ If granted, we request that the extension apply for both parties.

this requested extension, and agree that it would be appropriate to extend the due date for the reply motions by seven days also.

For these reasons, the United States respectfully requests an order extending the time for the parties to file response motions until August 24, 2022, as well as an extension for the parties to file reply motions until September 14, 2022.

Respectfully Submitted,

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PROPOSED ORDER

Having considered the United States of America’s motion for an extension of time, and finding that there is good cause to grant the motion, and finding that there is no opposition to the requested relief,

It is hereby ORDERED that the motion be, and hereby is, GRANTED.

The parties’ response motions are due to be filed on or before August 24, 2022; and the parties’ reply motions are due to be filed on or before September 14, 2022.

IT IS SO ORDERED.

The Hon. James E. Boasberg
United States District Judge