

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

UNITED STATES OF AMERICA)	
)	Case No. 21-CR-00609(APM)
v.)	Judge Amit P. Mehta
)	
JEREMY BROWN)	
)	
)	

MOTION FOR ADDITIONAL TIME TO RESPOND

The undersigned counsel, Dan Eckhart, respectfully moves the Court for an additional (10) ten days to respond to the United States’ Motion For Joinder of Cases For Trial. Dkt. 32. The Motion was filed on March 1, 2023 and a response is due before March 15, 2023. Mr. Bigney is out of the country and returns March 13th and the undersigned will be on vacation with his family from March 13th to March 17th (Spring Break for schools in Florida). The undersigned consulted with AUSA Kate Rakoczy on she had no objection to the relief requested.

Respectfully submitted,

By: <u>/s/ Dan Eckhart</u> DAN ECKHART, Esq. FL Bar No. 488674 200 E. Robinson St., Ste. 1150 Orlando, FL. 32801 dan@daneckhartlaw.com (407) 276-0500	<u>/s/ David Bigney</u> DAVID BIGNEY, Esq. FL Bar No: 132454 215 East Livingston Street Orlando, Florida, 32801 dbigney@bigneylaw.com (407) 425-6068
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CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties listed on the Electronic Case Filing (ECF) System.

By: <u>/s/ Dan Eckhart</u> DAN ECKHART	<u>/s/ David Bigney</u> DAVID BIGNEY
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