

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

UNITED STATES OF AMERICA,)
)
v.)
) **21-CR-505 (EGS)**
ISAAC YODER,)
) **Trial Date: 2/7/23**
Defendant.)

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE MOTIONS**

COMES NOW Defendant/Appellant Isaac Yoder, by and through undersigned counsel, John L. Machado, and requests an extension of thirty (30) days, until September 13, 2022, in which to file motions. In support of this motion, appellant state as follows:

1. Undersigned counsel was appointed to this case at the onset of this case on August 9, 2021.

2. On April 26, 2022, the court held a status conference in this matter. At that time, the court set a trial date of February 7, 2023.¹ The court also set a deadline for motions of August 15, 2023.

3. Counsel has spoken to Mr. Yoder, who indicates that there is a possibility that he will be retaining counsel in this matter. Mr. Yoder (and undersigned counsel) believe that having an extension of time of thirty (30) days will assist in Mr. Yoder's search for retained counsel.

4. In addition, because of counsel's recent schedule, and because of ongoing global discovery still being provided in the January 6th matters, undersigned counsel would request this additional time to file motions.

5. Counsel has contacted AUSA Sarah Wilson Rocha, who does not oppose this motion.

Wherefore, for the reasons provided above, Mr. Yoder respectfully requests an extension of time until September 13, 2022, in order to file motions in the present matter.

¹ In addition, undersigned counsel is part of a multi-codefendant matter that was recently rescheduled and overlaps with the present case - United States v. Caldwell et al., 22-CR-15 – where he represents Sandra Ruth Parker. This occurred because undersigned counsel believed that the date that was “penciled in” for the continuance did not overlap with the date chosen. If indeed counsel is retained, then there will presumably not be any issue with the conflict. If, however, undersigned counsel remains on the case, undersigned counsel will move to continue the trial to a different date (including doing it earlier if necessary). Undersigned counsel is very apologetic for having inadvertently created this situation and apologizes to any inconvenience to the court and/or government. Hopefully, given that the trial is several months away, undersigned counsel hopes the inconvenience can be adjusted with minimal difficulty should it become necessary.

Respectfully submitted,

ISAAC YODER
By Counsel

/s/ John L. Machado
John L. Machado, Esq.
Bar No. 449961
Counsel for Isaac Yoder
503 D Street, N.W., Suite 310
Washington, DC 20001
Telephone: (703) 989-0840
E-mail: johnlmachado@gmail.com

Certificate of Service

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 14th day of August, 2022, which will send a notification of such filing (NEF) to the following to all counsel of record.

/s/John L. Machado
John L. Machado, Esq.
Bar Number 449961
Attorney for Isaac Yoder
Law Office of John Machado
503 D Street NW, Suite 310
Washington, D.C. 20001
Telephone (703)989-0840
Email: johnlmachado@gmail.com