

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Case No.: 1:21-cr-00609-APM-1

v.

JEREMY BROWN.

MOTION TO EXTEND MOTION DEADLINE DATE (UNOPPOSED)

COMES NOW Jeremy Brown, via undersigned counsel, and moves this Court to extend the Motion deadline date in this matter from January 16th, 2024 to January 23rd, 2024 and as grounds states as follows:

1. Trial is set in this matter for March 4th, 2024.
2. At the last status conference held on November 27th, 2024, counsel requested trial not be set as early as March 4th, 2024 for several reasons.
3. Also on November 27th, 2024 defense counsel requested deadlines for a March 4th, 2024 trial date be set after January 16th, 2024 as Government's Appellee Brief is due to be filed in the United States Court of Appeals, Eleventh Circuit (23-11146) on January 16th, 2024 (Issues of *res judicata* or issue preclusion on the denial of a suppression motion in the lower Court may or may not be applicable in this District of Columbia case).
4. On November 28th, 2024 this Court entered its Minute Order establishing trial deadlines.
5. Motion deadline for defense to file Rule 12(b)(3)(A)(D) was set for January 16th, 2024.
6. Counsel has several doctor's appointments upcoming including, but not limited to, an appointment with a cardiologist this coming Friday.
7. Testing and other necessary specialist appointments scheduled on or after February 1st, 2024.
8. Counsel is also in the process of satisfying her CLE credits for the Florida Bar which must

be completed no later than January 31st, 2024.

9. Defense counsel apprised the Court on November 27th, 2023 that it is necessary to tend to her health.
10. Defense counsel will apprise the Court at earliest if a continuance of the March 4th, 2024 trial date is necessary, and, if necessary, counsel will file said motion to continue trial at earliest under seal.
11. Counsel also requests Jeremy Brown remain in Citrus Correctional and not be transported to the District of Columbia as discovery in this matter contains voluminous discovery and highly sensitive discovery. Counsel also needs to make a trip to the FBI office in Tampa to view the CHS highly sensitive information.
12. The Government is unopposed to an extension of the trial date from January 16th, 2024 to January 23rd, 2024.

WHEREFORE, Defendant respectfully requests this Motion be granted and the Court enter its Order accordingly.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Extend Motion Deadline (Unopposed) has been furnished via Electronic Filing to Louis Manzo, AUSA, and Kathryn Racowzsky, AUSA, Office of the U.S. Attorney, District of Columbia, and all other parties listed on this 9th day of January, 2023.

/s/ Maria T. Rodriguez

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