

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 21-CR-35/3:21-mj-02956
)	EMMET G. SULLIVAN
RONALD COLTON MCABEE)	Judge, United States District Court

MOTION TO EXTEND DEADLINE TO FILE RESPONSE

The accused, Ronald Colton McAbee respectfully moves this Court to extend by two days his deadline to respond to the government's Motion for Emergency Stay and for Review and Appeal of Release Order. Counsel believes that, in order to properly defend the Magistrate Judge's decision at the detention hearing, it is necessary to have a copy of that decision. Counsel has ordered the expedited transcription of that decision, and expects to have it tomorrow, Tuesday, September 14, 2021. Accordingly, it is respectfully requested that the Court extend the response deadline until Wednesday, September 15, 2021.

Respectfully prayed and submitted,

/s/ Isaiah S. Gant

ISAIAH S. GANT (BPR# 025790)

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CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2021, I electronically filed the foregoing *Motion to Extend Deadline to File Response* with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Colleen Kukowski, Assistant United States Attorney, Judiciary Center, 555 4th St. N.W., Washington DC 20530, this 13 day of September, 2021.

/s/ Isaiah S. Gant

ISAIAH S. GANT