

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

UNITED STATES OF AMERICA

v.

RONALD COLTON MCABEE,

Defendant.

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Criminal No. 21-CR-035 (RC)

SECOND MOTION TO EXTEND DEADLINE TO FILE RESPONSE

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully moves this Court to extend the deadline to respond to defendant Ronald Colton McAbee's Motion for Release from Pretrial Detention (the "Motion," Dkt. 279), which was filed on February 2, 2023. Pursuant to Local Criminal Rule 47(b), the deadline for the United States to respond to the Motion was initially February 16, 2023. On February 16, 2023, the Government requested an additional 10 days, until February 27, 2023 to file its response. Defense counsel did not object to the request and on February 16, 2023, the Court extended the deadline until February 27, 2023.

Certain of the defendant's arguments in the Motion pertain to his ability to access electronic discovery at the Central Virginia Regional Jail ("CVRJ"). The Government has requested information from CVRJ regarding its policies and procedures for handling and providing defendants access to electronic discovery, but has not yet received this information. In addition, the undersigned Assistant United States Attorney is scheduled to commence a trial in front of Judge Nichols on March 6, 2023, which is expected to last 1-2 weeks. The Government therefore respectfully requests that the Court extend the deadline to file a response to the Motion until March 31, 2023.

The Government understands that defense counsel is currently involved in a trial in front of Judge Mehta. The Government has contacted defense counsel regarding this request, but has not yet received a response.

Respectfully submitted,

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DC Bar No. 481052

By: /s/ Benet J. Kearney
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CERTIFICATE OF SERVICE

I certify that a copy of the Government's Motion for Extension of Deadline was served on all counsel of record via the Court's electronic filing service.

/s/ Benet J. Kearney
BENET J. KEARNEY
Assistant United States Attorney

Date: February 24, 2023