

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

UNITED STATES OF AMERICA

v.

ROBERT WAYNE DENNIS,

Defendant.

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CASE NO. 1:21-CR-00679-JEB

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO REPLY TO DEFENDANT’S MOTIONS TO DISMISS THE INDICTMENT
AND FOR CHANGE OF VENUE**


The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully requests an extension of time to respond to Defendant Robert Wayne Dennis’ (“the defendant’s”) Motions to Dismiss the Indictment and For Change of Venue, filed on October 13, 2022 (ECF Nos. 26 and 27). The Court ordered the government to respond to the defendant’s motions by October 27, 2022, with replies due by November 3, 2022.

The government respectfully requests that this Court grant it an extension to file its response until November 3, 2022, and for defendant’s reply to be filed by November 10, 2022. Given the nature of the litigation surrounding 18 U.S.C. § 231, and the effect it may have on other January 6-related cases in this Court, the government believes that a reply to the defendant’s motions may benefit the Court. The government respectfully requests a one-week extension so it may have sufficient time to properly reply to the defendant’s response. Additionally, if this Court grants an extension, we also respectfully request an additional week for defense to file its reply. Defense counsel does not oppose either request.

WHEREFORE, for the foregoing reasons, the government requests that its deadline to respond to the Defendant's Motion to Dismiss the Indictment be extended until November 3, 2022 and the deadline for the Defendant's reply be extended to November 10, 2022.

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar No. 481052

DATED: October 26, 2022

By: 

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CERTIFICATE OF SERVICE

I, Nialah S. Ferrer, certify that on October 26, 2022, I caused a copy of the above document to be served by electronic means on counsel for the defendant, Allen Orenberg, Esq.

A handwritten signature in black ink, reading "Nialah S. Ferrer". The signature is written in a cursive, flowing style.

Nialah S. Ferrer
Assistant United States Attorney