

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERIK HERRERA

Defendant.

Case No. 1:21-CR-00619-BAH

JOINT MOTION TO CONTINUE MOTION IN LIMINE DEADLINE

Defendant Erik Herrera by and through his attorney of record, Deputy Federal Public Defender Jonathan K. Ogata, and Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney Christopher M. Cook, together “the parties,” hereby jointly move for a continuance of the date to file motions in limine from June 17, 2022, to July 1, 2022.

1. On May 10, 2022, this Court issued a Minute Scheduling Order setting the following deadlines for motions in limine: By June 17, 2022, the parties shall file any pretrial motions, including any motions in limine, with any opposition due by July 1, 2022, and any reply due by July 8, 2022.

2. The parties have worked diligently to meet and confer regarding evidentiary issues, however the parties require additional time to determine, what if any, motions in limine they will need to file.

3. The parties are currently continuing to meet and confer regarding witnesses and exhibits and require additional time to independently resolve evidentiary issues and to determine what, if any, motions in limine will be needed.

4. Additionally, the parties are in the process of meeting and conferring on stipulations regarding witnesses and evidence. Such stipulations bear on the parties need to file motions in limine.

5. For these reasons, the parties respectfully move for a continuance of the date to file motions in limine by two weeks under the following proposed schedule: By July 1, 2022, the parties shall file any motions in limine, with any opposition due by July 15, 2022, and any reply due by July 22, 2022.

Respectfully submitted,

CUAUHTEMOC ORTEGA
Federal Public Defender

DATED: June 13, 2022

By /s/ Jonathan K. Ogata

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MATTHEW M. GRAVES
United States Attorney

DATED: June 13, 2022

By /s/ Christopher M. Cook

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