UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
V.)
)
DARRELL NEELY)

CRIMINAL NO. 21-CR-642(JDB)

<u>UNOPPOSED MOTION FOR EXTENSION TO FILE ADDITIONAL MOTIONS</u> <u>AND TO SUPPLEMENT THE MOTION TO SUPPRESS</u>

NOW COMES the defendant, Darrell Neely, by and through counsel, Kira Anne West and moves this Honorable Court to grant defendant's unopposed motion for extension of time to file additional motions and to supplement the motion to suppress and states the following in support:

 Undersigned counsel has not had time to travel to the Northern Neck to visit with her client due to a family emergency on November 17, 2022. Undersigned counsel had to travel to Chicago and has just returned after the

holiday.¹

 As the Court knows, undersigned counsel, like many on the CJA Panel, is defending multiple J6 cases and just finished today a long sentencing before Judge Mehta in *United States v. Matt Wood*, 21-CR-223, and has a bench

¹ Undersigned counsel is happy to file the specifics of the emergency under seal with the Court or send an email to the Court's law clerk.

trial before Judge Cooper starting December 5, 2022 in a multi-felony January 6 case.

 Undersigned counsel conferred with AUSA McFarlane who does not oppose an approximately two week extension but requests that his response deadline also be extended by two weeks.

WHEREFORE, the defendant requests that this Court issue an order granting the extension until December 13, 2022, and responses due December 27, 2022.

Respectfully Submitted,

/s/

Kira Anne West DC Bar No. 993523 712 H. Street N.E., Unit 509 Washington, D.C. 20002 (202)-236-2042 kiraannewest@gmail.com Attorney for Mr. Neely

Certificate of Service

I certify that a copy of the forgoing was filed electronically for all parties of record on this 28th day of November, 2022.

> /s/ Kira Anne West Attorney for Mr. Neely