

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

EDWARD VALLEJO,

Defendant.

No. 22-cr-15 (APM)

MOTION FOR LEAVE TO FILE RULE 29 MEMORANDUM OUT OF TIME

Mr. Vallejo, through counsel, respectfully moves for leave to file the attached memorandum in support of his Rule 29(a) motion one day out of time. On February 24, 2023, the Court granted Vallejo an additional day, to February 27, 2023, to file a memorandum in support of his Rule 29(a) motion. Although the brief was substantially completed by this date, the process of locating and inserting citations to the trial record proved time-consuming and pushed the completion of the brief into the following day. However, counsel for Vallejo believed including these record citations would be valuable to the Court in evaluating the important issues raised by the defendants' Rule 29(a) motions, and has endeavored to complete them as close as possible to the February 27th deadline. Accordingly, Vallejo respectfully requests leave to file the attached memorandum. In order to submit the brief as close as possible to the February 27, 2023 deadline, Vallejo is filing this motion prior to seeking the government's position.

February 28, 2023

Respectfully submitted,

/s/ Matthew J. Peed

Matthew J. Peed (D.C. Bar No. 503328)

CLINTON & PEED

1775 I St. NW, Suite 1150

Washington, D.C. 20006

(202) 919-9491 (tel)

(202) 587-5610 (fax)

Counsel for Defendant Edward Vallejo