

UNITED STATES DISTRICT COURT

DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 22-00060-BAH
	)	
VINCENT GILLESPIE	)	

**EMERGENCY<sup>1</sup> MOTION TO EXTEND FILING DEADLINE FOR MOTION TO  
DISMISS, CHANGE OF VENUE, AND MOTIONS IN LIMINE BY ONE DAY  
(UNOPPOSED)**

Defendant, Vincent Gillespie, respectfully requests that the Court extend the deadline for defendant's motion to dismiss, change of venue, and preliminary motions *in limine* by one day, to November 4, 2022. As reason therefore, the Court by minute order dated July 8, 2022, directed that certain filings, including motions to dismiss and motions *in limine*, be filed by November 3, 2022. Undersigned counsel, however, who is lead counsel in the instant matter, has just this day completed trial in *United States v. Dana A. Pullman, et al.*, Criminal No. 19-10345-DPW, a complicated RICO trial that has spanned the last six weeks. While initial estimates by the government and the presiding judge anticipated an October 28, 2022, finish to the trial, jury instructions and somewhat protracted deliberations extended the trial until this day when the jury delivered its verdict.

---

<sup>1</sup> Defendant recognizes that the Court's Standing Order [D.E. 9] requires motions to extend time or reschedule be filed within four business days of the targeted event. For the reasons set forth in this Motion, undersigned counsel respectfully requests that the requirement be waived for good cause shown. D.E. 9 at fn. 1.

The motion to dismiss, to change venue, and the preliminary motion *in limine* filings are substantially complete. Undersigned counsel, however, will need additional time to finalize each for filing. Defendant therefore requests that the deadline be extended by one to permit the filing of thoroughly briefed and concise pleadings.

The government does not oppose this Motion.

VINCENT GILLESPIE  
By his attorneys

/s/ Timothy G. Watkins  
Timothy G. Watkins  
Forest O'Neill-Greenberg  
Federal Defender Office  
51 Sleeper Street, Fifth Floor  
Boston, MA 02210  
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on November 3, 2022.

/s/ Timothy G. Watkins  
Timothy G. Watkins