

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

Case No.: 1:22-cr-00011-RJL-5

JAMES BRETT.

MOTION TO EXTEND PRE-TRIAL MOTION DEADLINE (UNOPPOSED)

COMES NOW, James Brett, via undersigned counsel, and files this Motion to Extend Pre-trial Motion Deadline (Unopposed) pursuant to Rule 12 of the Federal Rules of Criminal Procedure and moves this Honorable Court to extend the pre-trial motion deadline from June 30th, 2023 to July 24th, 2023 and as grounds states as follows:

1. Trial in this matter is not scheduled.
2. Counsel filed her Notice of Appearance on April 23rd, 2023.
3. All pre-trial motions are due on June 30th, 2023.
4. Counsel is unable to retrieve Usafx discovery.
5. Present counsel has been addressing the Usafx issues with the Government on DC cases since May, 2023. Fortunately, at present, counsel is working diligently with Government's tech personnel in attempts to rectify the Usafx problem.
6. Counsel has trial in DC July 10th, 2023.
7. Counsel needs an extension of the June 30th, 2023 deadline to July 24th, 2023 in order to access and review discovery, prepare with her client and draft all pre-trial motions.
8. The next hearing is scheduled for July 28th, 2023.
9. The Government is unopposed to this Motion.
10. This Motion is made in good faith and not to harass or cause any undue delay or burden.

WHEREFORE, Defendant, James Brett, respectfully requests this Court grant this unopposed Motion and enter its Order extending the deadline for pre-trial motions from June 30th, 2023 to July 24th, 2023.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Extend Pre-trial Motion Deadline (Unopposed) has been furnished via Electronic Filing to Michael Moore AUSA, Office of the U.S. Attorney, District of Columbia, and all other parties on the service list on this 27th day of June, 2023.

/S/ Maria T. Rodriguez

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