

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

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Case No. 1:22-cr-0080-CRC
	:	
JOSHUA JOHNSON,	:	
Defendant.	:	

**CONSENT MOTION FOR EXTENSION
OF TIME TO FILE PRE-TRIAL MOTIONS**

Comes now Defendant Joshua Johnson, by and through counsel, to request the entry of an Order extending the time by which he may file pre-trial motions as suggested herein. As grounds, the following is stated:

1. This motion is consented to, per Assistant U.S. Attorney Alexis Loeb.
3. Trial is scheduled for July 10, 2023.
4. Pre-trial motions are due to be filed on or before February 8, 2023.
5. Plea discussions are ongoing between the parties. The parties would like to delay the filing of pre-trial motions until plea negotiations are finalized, and either accepted or rejected by Mr. Johnson.
6. Grant of this motion to extend the time to file pre-trial motions should not affect the orderly administration of the Court’s business.
7. The following amended schedule is proposed:
 - a. Pre-trial motions to be filed on or before March 13, 2023
 - b. Responses to be filed on or before April 3, 2023.

c. Any replies to be filed on or before April 17, 2023.

WHEREFORE, for the foregoing reasons and such other reasons that may appear just and proper, defendant Joshua Johnson requests the entry of an Order extending the time by which he may file pre-trial motions as suggested herein.

Respectfully submitted,

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Dated: February 1, 2023