

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

UNITED STATES OF AMERICA

v.

JACOB L. ZERKLE,

Defendant.

No. 22-cr-100-RBW

**DEFENDANT'S UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO FILE MOTIONS *IN LIMINE***

Defendant Jacob L. Zerkle, through his undersigned counsel, files the present motion seeking the extension of time of one week on the motions briefing schedule set forth in the Court's Pretrial Scheduling Order (D.E. 22), and states as follows:

1. On March 25, 2022, the Government returned an Indictment in this matter.
2. On April 8, 2022, the Defendant was arraigned on the Indictment. After multiple status hearings and exclusions of time under the speedy trial act, a trial was set in this matter for June 12, 2023.
3. Pursuant to a Pretrial Scheduling Order dated September 30, 2022, this Court issued the following briefing schedule: Motions *in Limine*, if any, due by February 3, 2023, oppositions due by February 24, 2023, and reply submissions, due by March 10, 2023.
4. Due to defense counsel's ongoing case commitments and two trials scheduled prior to the June 12, 2023 trial in this matter, the Defendant respectfully requests a brief extension of time of one week on all deadlines relating to the Court's motions briefing schedule that will not affect any other court deadline or the speedy trial act, as time has already been excluded through the trial date in this matter.

5. As set forth in the attached Proposed Order, the Defendant requests that the following new dates apply to the Court's briefing schedule: Motions *in Limine*, if any, are due by **February 10, 2023**, oppositions are due by **March 3, 2023**, and reply submissions are due by **March 17, 2023**.

6. Undersigned counsel conferred with Government counsel, Benet J. Kearney, Esq., on January 28, 2023, who represented that the Government *does not oppose* the relief requested in this motion.

7. For the aforementioned reasons, the Defendant respectfully requests that his motion for an extension of time be granted.

Dated: January 30, 2023

Respectfully submitted,

/s/ Christopher Macchiaroli

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