IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, : CRIMINAL NO. 1:22-CR-15

Plaintiff :

: (JUDGE MEHTA)

v. :

:

JESSICA WATKINS,

Defendant :

CONSENT MOTION TO EXTEND TIME TO REPLY TO GOVERNMENT MEMORANDUM IN OPPOSITION TO ECF. NO 216, RESPONSE TO 404(b) NOTICE

- On 8 July 2022, the Government filed Motion Regarding Anticipated Trial
 Evidence and Notice Pursuant to Federal Rule of Evidence 404(b) (ECF No.(s) 187 & 190).
- On 29 July 2022, Defendant, Jessica Watkins, by and through her attorney,
 Jonathan Crisp, Esq., filed Response in Opposition to the Government's Motion
 and Notice regarding evidence under F.R.E. 404(b) in accordance with this
 Honorable Court's Minute Order granting an extension of time to file
 response/reply (ECF No. 197).
- On 12 August 2022, the Government filed Memorandum in Opposition to
 Defendants' Motions in Limine to Exclude Anticipated Trial Evidence Noticed
 Pursuant to Federal Rule of Evidence 404(b) (ECF No. 251).

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4. In accordance with the Pretrial Order, the Defendant's Reply to the

Government's Opposition would be due 19 August 2022.

5. The Defendant seeks a one-day extension due to undersigned counsel being out

of the office for longing than anticipated undergoing a medical procedure which

precluded his ability to respond timely.

6. Undersigned Counsel conferred with the government counsel, AUSA Rokoczy,

who consents to the relief requested.

WHEREFORE, Defendant Jessica Watkins respectfully requests that the

Court grant this Consent Motion to Extend Time for Defendant's Reply to

Government's Memorandum in Opposition.

Respectfully Submitted,

Dated: 19 August 2022

/s/Jonathan W. Crisp Jonathan W. Crisp, Esquire 4031 North Front St. Harrisburg, PA 17110 I.D. # 83505 (717) 412-4676

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on the individual listed below:

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Date: 19 August 2022 /s/ Jonathan W. Crisp

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