

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case No.: 21-CR-692 (CKK)
	:	
v.	:	
	:	
THOMAS FASSELL,	:	
	:	
MARILYN FASSELL,	:	
	:	
Defendants.	:	

**UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO DEFENDANT
MARILYN FASSELL’S MOTION TO MODIFY CONDITIONS**

The government respectfully requests a one-week extension of the deadline for its response to defendant Marilyn Fassell’s motion to modify conditions for release (Doc. 30), for the following reasons:

1. On April 20, 2022, defendant Marilyn Fassell filed a motion to modify condition of release (Doc. 30), which the government opposes. The Court ordered the government to respond by April 27, 2022.
2. On April 26, 2022, defendant Thomas Fassell filed a motion to adopt and join Marilyn Fassell’s motion (Doc. 34). The government does not oppose joinder of the motion but opposes the ultimate relief requested.
3. If the Court grants defendant Fassell’s motion for joinder, the government believes it would be the most efficient use of government resources and the Court’s time for the government’s response to include both defendants. However, including Thomas Fassell’s information will require additional preparation, such as additional review of documents

like Mr. Fassell's pretrial services report and other considerations, in addition to completing an analysis of the 3142(g) for Mr. Fassell.

4. Additionally, government counsel will be traveling on April 27, 2022 and will not be able to modify its response to include the additional information.
5. Counsel for the government has consulted with both counsel for Thomas and Marilyn Fassell and neither oppose the government's request for an extension.

The government therefore requests a one-week extension of time to respond, to May 4, 2022.

Respectfully submitted,

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