IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:21-cr-537 (JMC)
	)	
PAUL JOHNSON	)	
Defendant.	)	
_____	)	

MR. JOHNSON'S UNOPPOSED MOTION TO EXTEND MOTION DEADLINE

Paul Johnson, through counsel, respectfully seeks an extension of the motion deadline, currently set for October 7, 2022.

Arrested in April of 2021, *see* 21-mj-367 at 5, Mr. Johnson's case has been in litigation for approximately a year and half. For much of this time retained counsel represented Mr. Johnson. On July 7, 2022, previous counsel for Mr. Johnson moved to withdraw. ECF 182. At a status conference held on July 8, 2022, the Court granted this request and also set the following deadlines: motions due by October 7, 2022, responses due by October 28, 2022, replies due by November 4, 2022, and a motion hearing set for November 17, 2022, by zoom. *See* July 8, 2022, minute order.

Undersigned counsel entered an appearance on August 17, 2022, ECF 190, and obtained access to a large portion of discovery in late August and early September. To allow counsel the opportunity to finish review of discovery prior to filing any Rule 12 motions, Mr. Johnson requests an extension of the motion deadline by three weeks, until October 28, 2022. Mr. Johnsons, requests that the accompanying deadlines for responses and replies also be extended by the times contemplated in the Court's

original scheduling order, making responses due November 18, 2022, and replies due November 25, 2022.

Prior to filing this motion undersigned contacted Assistant United States Attorney Karen Rochlin who has no objection to the requested extension.[1] A proposed order is attached for the Court's convenience.

Dated: October 3, 2022.

Respectfully Submitted,

/s/ Lauren E. S. Rosen
Lauren E. S. Rosen
Assistant Federal Public Defender
Office of the Federal Public Defender
1650 King Street, Suite 500
Alexandria, Virginia 22314
(703) 600-0800
(703) 600-0880 (fax)
Lauren_Rosen@fd.org

[1] Undersigned counsel contacted co-defendant's counsel understanding that it may be beneficial to keep all parties on the same motion schedule. Angie Halim, counsel for Stephen Chase, indicated that she would benefit from the requested extension. Juli Haller, who along with Stanley Woodward represents Ryan Samsel, indicated they would also benefit from an extension, but may need a longer extension as they are in the midst of a projected 6-week jury trial.