IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNI	FED STA	ATES				*					
vs.						*	Case No.: 22-15-APM				
	ER STE		RHOD	ES, III,		*	*				
KELLY MEGGS, KENNETH HARRELSON, JESSICA WATKINS, and						*					
	MAS CA					*					
	*	*	*	*	*	*	*	*	*	*	*

UNOPPOSED REQUEST TO EXTEND DEADLINES FOR DEFEFENDANTS' CONSOLIDATED REPLIES AS TO MOTION FOR JUDGMENT OF ACQUITTAL AND MOTION FOR NEW TRIAL

COMES NOW, the Defendants, Elmer Stewart Rhodes, III, Kelly Meggs, Kenneth

Harrelson, Jessica Watkins and Thomas Caldwell, by and through counsel, and respectfully request that the deadline for defense consolidated replies as to their previously filed Motion for Judgment of Acquittal and Motion for New Trial be extended by four (4) days, and in support of said motion states as follows:

- The Government, per Assistant U.S. Attorney Kathryn Rakoczy, does not object to the instant request.
- 2. The current deadline for defense consolidated replies as to the Motion for Judgment of Acquittal and Motion for New Trial is currently January 20, 2023.
- 3. Counsel for the defendants require additional time to prepare their consolidated replies.
- 4. Counsel for the Defendants believe an additional four (4) days is sufficient to prepare their replies.

WHEREFORE, the Defendants respectfully request that defense consolidated replies as to

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the Motion for Judgment of Acquittal and Motion for New Trial be extended by four (4) days, thus making their replies due January 24, 2023.

Respectfully submitted,

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/s/ Brad Geyer

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Counsel for Defendant Kelly Meggs

/s/ Jonathan W. Crisp Jonathan W. Crisp, Esquire 4031 North Front St. Harrisburg, PA 17110 I.D. # 83505 (717) 412-4676 jcrisp@crisplegal.com Counsel for Defendant Jessica Watkins

<u>/s/David W. Fischer</u> David W. Fischer, Esq. Federal Bar No. 023787 Law Offices of Fischer & Putzi, P.A. Empire Towers, Suite 300 7310 Ritchie Highway Glen Burnie, MD 21061 (410) 787-0826 fischerandputzi@hotmail.com Attorney for Defendant Thomas Caldwell

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of January, 2023, a copy of the foregoing Unopposed Request to Extend Deadline for Defendants' Consolidated Replies as to Motion for Judgment of Acquittal and Motion for New Trial was electronically filed with the Clerk of the United States District Court using CM/ECF, with a notice of said filing to the following:

Counsel for the Government:

Office of the United States Attorney 555 4th Street, NW Washington, DC 20001

> /s/David W. Fischer David W. Fischer, Esq.