

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

UNITED STATES OF AMERICA,)

)

)

v.)

Case No. 1:22-cr-00404

Hon. James E. Boasberg

)

ISREAL JAMES EASTERDAY,)

Defendant.)

)

)

MOTION TO CONTINUE SUPPRESSION MOTIONS DEADLINE

Isreal James Easterday, by undersigned counsel, respectfully requests the Court to continue the suppression motions deadline, currently set for July 7, 2023 (Dkt. No. 26), until two weeks after the defense's Motion to Compel Discovery Under Fed. R. Crim. P. 16 (Dkt. No. 29) is resolved. As set forth in the defense's motion to compel discovery, Mr. Easterday is requesting that the Court order the government to produce raw data relating to three specific location zip files that Google produced to the government in response to the January 13, 2021 search warrant.¹ This data is material to Mr. Easterday's anticipated filing of a motion to suppress and necessary for the defense's expert to verify the accuracy of certain data relating to Mr. Easterday's location history in support of such motion to suppress. A Proposed Order is attached to the instant Motion.

Counsel for the government represented that it opposes this continuance request.

¹ Specifically, the defense just needs the zip file that contains Mr. Easterday's location history; however, to date, the government has refused to indicate which zip file contains that data. Accordingly, the defense has requested all three zip files.

Respectfully submitted,

ISREAL JAMES EASTERDAY

By counsel,

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