

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 23-cr-69-CKK**
 :
 ISAAC THOMAS, :
 CHRISTINA LEGROS :
 Defendants. :

GOVERNMENT’S UNOPPOSED MOTION TO EXTEND FILING DEADLINES

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, seeks an extension of the filing deadlines related to the above captioned defendants—specifically, the deadlines of (i) September 29, 2023 to file any motions related to the continuation of Defendant Legros’s prosecution; and (ii) October 2, 2023 to file a Proposed Pretrial Filings Schedule related to Defendant Thomas’s prosecution.

On August 28, 2023, this Court ordered the parties to confer and review the proposed pretrial scheduling order and to file proposed deadlines by October 2, 2023. ECF 49. On September 8, 2023, Counsel for Isaac Thomas indicated that he would seek to withdraw from the case. ECF 54. To date, however, no such public motion has been filed and no new counsel has entered an appearance on Thomas’ behalf. Current defense counsel has indicated that it would be unlikely that he could continue to be Defendant Thomas’s representative.

On August 31, 2023, this Court ordered the government to files motions, if any, related to the continuation of Defendant Legros’s case by no later than September 29, 2023. Minute Order dated August 31, 2023. Since this minute order, the Court has ordered the facility housing Defendant Legros to provide information regarding her condition to Pretrial Services in the Western District of Michigan. ECF 57.

The government respectfully seeks an extension of its existing filing deadlines. With respect to Defendant Legros, the government has attempted to seek information from the state-level prosecutor handling Defendant Legros’s state-level charges, attempted to seek information from the attorney representing her on those state-level charges, attempted to gain information from state-level counsel tasked with a prior case Ms. Legros was involved with, attempted contact directly to the facility she’s housed in, and attempted to gain information from the state-level case manager she was assigned as part of her state-level case. Thus far, the government has been unsuccessful in obtaining *any* information related to Ms. Legros’s condition.

Additional time is needed, for the government to complete its assessment of Legros’s current condition or her future prognosis to determine what it hoped to be in a position to decide by this September 29, 2023, deadline.

The government has conferred with each defendants’ counsel; neither oppose this motion.

Respectfully submitted,

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Date: August 29, 2023

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