

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

**UNITED STATES OF AMERICA** )

v. )

**DANIEL BALL,** )

*Defendant.* )

**Criminal No. 1:23-cr-00160-RC-1**

**DEFENDANT’S MOTION TO EXTEND CERTAIN FILING DEADLINES  
AND CONTINUE PRETRIAL MOTIONS HEARING**

Daniel Ball, by and through undersigned counsel, respectfully moves to extend the deadlines for motions to suppress and motions in limine and continue the June 28, 2024 pretrial motions hearing. In support of this Motion, counsel submits as follows:

1. On December 23, 2023, the Court entered a Pretrial Scheduling Order, setting a deadline for pretrial motions (except motions in limine) for March 22, 2024, a deadline for motions in limine for July 17, 2024, a hearing on the pretrial motions other than any motions in limine for June 28, 2024, and a deadline for the Joint Pretrial Statement for August 16, 2024. *See* ECF No. 19.

2. In January 2024, Ms. Collins left her previous firm where she was representing Mr. Ball. Mr. Ball subsequently re-retained Ms. Collins. Despite her best efforts, Ms. Collins began receiving parts of Mr. Ball’s case file within the last three (3) weeks from her prior firm. Ms. Collins received the remainder of the case file less than three (3) weeks ago.

3. Undersigned counsel and the government are exploring a stipulated trial as a means to resolve this case.

6. In order to allow Ms. Collins to review the remainder of the discovery in this case and to otherwise adequately prepare motions to suppress<sup>1</sup> and motions in limine, undersigned counsel requests that this Court extend the deadlines for motions to suppress and motions in limine to July 31, 2024. Of note, should the parties proceed with a stipulated trial, there would be a sincere likelihood that no motions to suppress or motions in limine would need to be filed in this case.

7. Additionally, undersigned counsel requests that the Court continue the pretrial motions hearing set for June 28, 2024 to a later date that the Court deems appropriate, as undersigned counsel will be in trial in a complex white-collar matter in the U.S. District Court for the District of Arizona that begins on June 4, 2024 and is set for four (4) weeks.

8. Lastly, based on the proposed amended dates, to allow for certain substantive issues to be resolved in a timely manner prior to submission of the Joint Pretrial Statement, undersigned counsel requests that the deadline for the Joint Pretrial Statement be extended to August 23, 2024.

9. The government opposes this Motion.

Accordingly, Mr. Ball respectfully requests the aforementioned relief.

Respectfully submitted,

\_\_\_\_\_/s/  
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<sup>1</sup> Ms. Collins does not ask for the Court to extend the deadline for other Rule 12 motions at this time.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this 12th day of March 2024, I have served this Motion upon all parties in this matter through the CM/ECF system.

\_\_\_\_\_/s/\_\_\_\_\_  
Amy C. Collins