

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 1:23-cr-00160-RC-1
)
 DANIEL BALL,)
)
 Defendant.)

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

Daniel Ball, by and through undersigned counsel, respectfully files this Reply to the government’s Opposition to his Motion to Extend Certain Filing Deadlines and Continue Pretrial Motions Hearing, *see* ECF No. 21. In support of this Reply, counsel submits as follows:

1. On March 18, 2024, the government submitted an Opposition, wherein it proposed various dates. *See id.*
2. Since undersigned counsel filed the Motion to Extend Certain Filing Deadlines and Continue Pretrial Motions Hearing, *see* ECF No. 20, there have been significant advancements in the case before the U.S. District Court for the District of Arizona that have exponentially increased the likelihood of a pretrial resolution therein.
3. Accordingly, undersigned counsel consents to the majority of the government’s proposed dates¹ but requests that the Court extend the deadline for all Federal Rule of Criminal Procedure 12 motions to April 19, 2024, a request to which the government consents.² Undersigned

¹ Specifically, undersigned counsel consents to the government’s proposal (a) to keep the dates for the hearings currently set in this case, the trial start date, and the deadlines for expert notices and related filings and (b) to amend the joint pretrial statement deadline to August 23, 2024 and the motions in limine deadline to July 31, 2024, with responses due by August 14, 2024 and replies due by August 21, 2024.

² The government provided consent to undersigned counsel following the submission of the government’s Opposition.

counsel has communicated to the government that undersigned counsel might need to request more time to file motions to suppress; however, the parties have agreed to take up that issue at a later time.

4. The parties have also agreed to reconsider dates depending on if the matter before the District of Arizona does not resolve pretrial within the next two (2) weeks or so, depending on how the Court rules on Mr. Ball's forthcoming Motion to Dismiss, and depending on if the parties come to terms on proceeding via stipulated trial or plea.

Accordingly, Daniel Ball, with the consent of the government, respectfully requests the above-mentioned relief.

Respectfully submitted,

_____/s/_____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 20th day of March 2024, I have served this Reply upon all parties in this matter through the CM/ECF system.

_____/s/_____
Amy C. Collins