

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

UNITED STATES OF AMERICA

vs.

**DONOVAN CROWL,
Defendant**

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Case No. 1:21-cr-00028-2 (APM)

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CONSENT MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS

Donovan Crowl, by his undersigned counsel, respectfully moves this Honorable Court to extend the time for filing pretrial motions for sixty-days. Government counsel consent to this request.

1. At the last Status Hearing, the Court set a deadline of July 1, 2021, for the filing of pretrial motions pursuant to Rule 12(b), Fed. R. Crim. Proc.

2. During the past months, the United States has continued to produce voluminous discovery including hundreds of FBI files, videos, social media files and other extensive materials. In addition, the Government is still in the process of responding to specific discovery requests particular to Mr. Crowl.

3. A number of the motions to be filed in this case involve complex issues that implicate both novel legal concepts and as-applied constitutional challenges that cannot be adequately addressed without review of the discovery.

4. The expansion of the conspiracy to include a total of 16 defendants, a number of unnamed individuals, and at least one defendant charged in a separate indictment, who is alleged to be a member of the Oath Keepers, has also increased the time necessary to review discovery.

5. Despite due diligence, counsel has been unable to review all the discovery, fully research the issues and prepare the necessary motions.

WHEREFORE, Donovan Crowl, respectfully requests that the Court extend the time for filing pretrial motions for 60-days to and including September 1, 2021.

Respectfully submitted,

/s/ Carmen D. Hernandez

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Counsel for Donovan Crowl

CERTIFICATE OF SERVICE

I hereby certify that the instant notice was served on all counsel of record 1st day of July, 2021 on all counsel of record via ECF.

/s/

Carmen D. Hernandez