

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 23-cr-229 (CJN)</b>
	:	
<b>TAYLOR FRANKLIN TARANTO,</b>	:	
	:	
<b>Defendant.</b>	:	

**UNOPPOSED MOTION FOR EXTENSION**

The United States of America hereby respectfully moves the Court for an extension of time for the parties to submit their *Fischer*-related briefs in August. The parties have conferred and the defense is not opposed.

There is good cause for such an extension. Mr. Taranto is charged with violating 18 U.S.C. § 1512(c)(2). On June 28, 2024, the Supreme Court of the United States decided *Fischer v. United States*, vacating the D.C. Circuit’s judgment and holding that “[t]o prove a violation of Section 1512(c)(2), the Government must establish that the defendant impaired the availability or integrity for use in an official proceeding of records, documents, objects, or as we earlier explained, other things used in the proceeding, or attempted to do so.” No. 23-5572, 2024 WL 3208034, at \*10 (U.S. June 28, 2024). The Supreme Court remanded *Fischer* to the D.C. Circuit for further proceedings and to assess the sufficiency of the indictment on that count. Based on the Supreme Court’s opinion and the forthcoming proceedings in the D.C. Circuit, the government anticipates that it will need additional time to evaluate its prosecution of charges under 18 U.S.C. § 1512(c)(2).

For these reasons, the government respectfully requests that the Court move the defendant's deadline for any *Fischer*-related motion from July 15<sup>th</sup> to August 2<sup>nd</sup>, the deadline for any opposition to August 16<sup>th</sup>, and the deadline for any reply to August 23<sup>rd</sup>.

Respectfully submitted,

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