

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

UNITED STATES OF AMERICA

v.

DONALD J. TRUMP,

Defendant.

Case No. 1:23-cr-00257-TSC

UNOPPOSED MOTION FOR LEAVE TO FILE

Defense counsel set an internal deadline for today to submit its reply in support of its pending motions for an order regarding the scope of the prosecution team, Docs. 166-1, 169, and to compel discovery, Doc. 167, but did not realize that the Court had adjusted the time in which to file to 5 PM this evening. Once defense counsel recognized the time deadline, we immediately emailed government counsel requesting consent to file before midnight. Counsel for the government has consented to this filing. Therefore, defense counsel respectfully requests leave to file its reply concurrent with this motion for leave. There is no prejudice to any party herein and the public interest favors a full briefing of all these important issues. Defense counsel will ensure future filings subject to the Court's scheduling order, Doc. 233, are submitted by 5:00 PM EST on the applicable deadline.

Dated: September 19, 2024

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Respectfully submitted,

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