

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

UNITED STATES OF AMERICA,

**Case No. 23-80101-CR
CANNON/REINHART**

vs.

DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA,

Defendants.

DEFENDANTS' MOTION FOR AN EXTENSION OF REPLY DEADLINES

President Donald J. Trump respectfully submits this motion, on behalf of all of the Defendants, for an extension of the deadlines for filing certain reply submissions in support of pending pretrial motions. The Special Counsel's Office opposes this request.

The current deadline for submitting replies is March 14, 2024. In anticipation of the March 14 hearing, President Trump will file replies in support of the pending motions relating to the Presidential Records Act, ECF No. 327, and the Espionage Act, ECF No. 325, on the afternoon of March 13. The Defendants respectfully request permission to file replies relating to the other pending motions by March 24.

The reasons for this request are that (1) the Defendants and counsel need to travel to Fort Pierce prior to March 14 in order to participate in the hearing, which is time we would otherwise use to prepare the other reply submissions; (2) President Trump and counsel need to spend time preparing for the oral argument, which is time we would otherwise use to prepare the other reply submissions; (3) President Trump and counsel are currently preparing for a trial in New York, New York that is scheduled to begin on March 25, 2024, and the need to simultaneously devote attention to that case and this matter has been necessitated in part by the discovery violations and strategic scheduling demands of the Special Counsel's Office that have prejudiced President

Trump in multiple respects; (4) on March 12, counsel for Defendants Nauta and De Oliveira are reviewing physical evidence possessed by the Office that is potentially relevant to their reply submissions; and (5) Defendant Nauta is in the process of conferring with the Office regarding access to materials relating to grand jury practices in the District of Columbia that are relevant to his reply in support of pending selective and vindictive prosecution motion.

The Defendants have no intention of causing unnecessary delay in these proceedings. Allowing additional time to file reply submissions that meaningfully address the opposition filings by the Special Counsel's Office will contribute to the orderly resolution of the pending motions. Moreover, the pending motions for an order regarding the scope of the prosecution team and to compel discovery, ECF No. 262, are relevant to several of the pretrial motions for which additional time is being sought. The resolution of the discovery motions is very likely to require supplemental briefing regarding the pretrial motions. Therefore, we respectfully submit that no actual delay or prejudice to the Office would result from the extensions we are seeking. Accordingly, the Defendants respectfully request an extension, until March 24, 2024, to file reply submissions in support of pretrial motions other than those relating to the Presidential Records Act and the Espionage Act.

Dated: March 11, 2024

Respectfully submitted,

/s/ Todd Blanche

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CERTIFICATE OF SERVICE

I, Christopher M. Kise, certify that on March 11, 2024, I electronically filed the foregoing document with the Clerk of Court using CM/ECF.

/s/ Christopher M. Kise
Christopher M. Kise