

**UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT**

**UNITED STATES OF AMERICA,**  
**Plaintiff-Appellee,**

**v.**

**JEFFREY R. MACDONALD,**  
**Defendant-Appellant**

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**APPEAL NO. 14-7543**

**MOTION OF APPELLANT  
TO EXTEND TIME  
TIME TO FILE OPENING  
BRIEF AND APPENDIX**

**TO THE HONORABLE CLERK OF THE FOURTH CIRCUIT COURT OF APPEALS**

NOW COMES the Defendant and Appellant, Jeffrey R. MacDonald, through his undersigned attorney, William M. Palmer, Esq., and moves this Honorable Court to extend the time for the Appellant to file and serve his Opening Brief and Appendix for 30 days, to be reset to be due on April 16, 2015, and to reset subsequent due date(s) by the same time period.

In support of this Motion, the Defendant-Appellant provides the Court with the following:

1. William M. Palmer, Esq., attorney for Defendant-Appellant, appeared on February 9, 2015.
2. The Court set the Appellant’s Brief and Appendix to be due on March 17, 2015, and the Response Brief to be due on April 10, 2015.
3. Attorney Palmer was not the Defendant-Appellant’s attorney at the district court level, is new to this case and to this appeal, and up to the time of his appearance had never before studied the evidence before the Court in this case and in this appeal.
4. While Attorney Palmer was previously a federal public corruption and also a federal fraud prosecutor, having worked at the Fraud Section and Public Integrity Section of the

Criminal Division and at the Offices of the U.S. Attorneys for the Central District of California and the Eastern District of Virginia, he is not a criminal appeals specialist, and he has no previous acquaintance with the Innocence Protection Act of 2004 nor with the science of forensic DNA testing.

5. Attorney Palmer requires more time to study the evidence in this case and appeal; the prior filings that bear on the appeal, which are numerous and lengthy; the science of forensic DNA testing; and the relevant law; so as to be able to properly prepare and file a brief on behalf of his client.
6. The Plaintiff-Appellee, the U.S. government, does not object to this request.

Dated: March 17, 2015

Respectfully submitted,

JEFFREY R. MACDONALD  
Defendant & Appellant,  
By

*/s/ William M. Palmer*

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*Counsel for Defendant–Appellant*

### **CERTIFICATION OF SERVICE**

I certify that on this day March 17, 2015, this paper is being served on all counsel of record by email through the ECF system pursuant to the Federal Rules of Appellate Procedure and the Local Rules.

/s/ William M. Palmer  
William M. Palmer