

RAW

IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

UNITED STATES OF AMERICA

No.14-7543

v.

MOTION FOR EXTENSION
TO REPLY TO GOVERNMENT
RESPONSE

JEFFREY R. MACDONALD

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

NOW COMES the Defendant, Jeffrey R. MacDonald, requesting additional time to reply to the government response in the above captioned case, dated October 27, 2015.

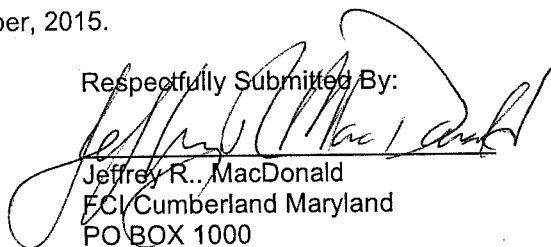
In support of this Motion, the Defendant provides the Court with the following:

1. Defendant received the Response on November 3, via the prison mail system.
2. Defendant awaited instructions from the Court, but has since learned that a Reply is optional, and therefore, no letter from the Court was in order.
3. The government Response is quite lengthy (approximately 29 pages) and a Reply (which Defendant would appreciate the opportunity to provide) will require research and the time needed to address the government's filing in a manner that is worthy of the Court's attention.
4. Defendant is limited in his ability to acquire needed information and documentation in order to reply, given reliance on U.S. first class mail and prison procedures which can delay the mailing and receipt of items. In addition, the preparation of a Reply document requires technical logistics which are not in the Defendant's control and will require time and a dependency on the availability of prison staff to complete.
5. The length of the government Response requires more time to address than would be needed by an attorney; the Defendant asks the Court for an extension of time as he is currently self-represented by necessity.

THEREFORE, the undersigned respectfully requests that this Motion be granted and that the Defendant be permitted 30 days to provide a Reply by December ____, 2015.

This is the 10th day of November, 2015.

Respectfully Submitted By:


 Jeffrey R. MacDonald
 FCI Cumberland Maryland
 PO BOX 1000
 Cumberland, MD 21501

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 2015 NOV 16 AM 10:19
 U.S. COURT OF APPEALS
 FOURTH CIRCUIT

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Motion via
first class mail to:

Mr. John S. Bruce, Esq.
First Assistant U.S. Attorney
310 New Bern Avenue
Raleigh, NC 27601

This is the 10th of November, 2015.

⇔00131-177⇔

Jeffrey Macdonald
Federal Correctional
Institution
P.O. box 1000
Cumberland, MD 21501-1000
United States

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BALTIMORE MD 212

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⇔00131-177⇔

R J Warren
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Court of Appeals, 4th Cir
Richmond, VA 23219
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Attorney AT LAW - Clerk of the Court

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Special legal mail

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