

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>Criminal No. 07-48-01</b>
<b>v.</b>	:	
	:	
<b>WILLIAM POYNTER, et al.</b>	:	
<b>Defendant</b>	:	

**MOTION TO EXTEND TIME TO FILE MOTIONS**

Counsel for Defendant, William Poynter, Carrie Crawford, Esquire and Imhoff and Associates, hereby submits this motion to extend the time to file motions in this matter and in support thereof states as follows:

1. Defendant’s deadline for filing motions or notices in this matter was set by this Court to be August 21, 2007.
2. Counsel for defendant had requested certain discovery items including a videotape and photographs, which the government had promised to deliver prior to defendant’s motion deadline. The discovery has not been delivered to date and the government has indicated that delivery of the items should occur this week.
3. Defense counsel’s review of the outstanding discovery will determine if additional motions or notices are required to be filed in this matter.
4. Counsel for the government has been conferred on this issue and does not object to this motion.

For the foregoing reasons, counsel for defendant respectfully requests that the Court grant this motion.

Respectfully submitted,

s/CARRIE CRAWFORD, ESQ.  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that on August 21, 2007 I electronically filed the foregoing document with the Clerk of the Court, for the District of Columbia using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the U.S. Attorney of Record, Anthony Scarpelli.

s/Carrie Crawford