

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

IN RE: GRAND JURY SUBPEONA (1:19-dm-0003)

No.: 19-1287

MOTION TO EXTEND DEADLINE FOR OPENING BRIEF

Comes Now, Chelsea Manning, and respectfully moves this Court to extend the briefing schedule such that the appellant's opening brief is due on March 29, 2019. As grounds for her motion, Ms. Manning states (1) that this court set a briefing schedule on March 19, 2019, with appellant's opening brief due March 26, 2019, and notified local counsel Chris Leibig of the briefing schedule by ECF filing on that day; (2) that local counsel Chris Leibig was unaware that lead counsel Moira Meltzer-Cohen was not attached to the ECF filing from March 19, 2019, and takes full responsibility for that oversight; (3) that lead counsel Moira Meltzer-Cohen was scheduled to travel for another case on the afternoon of March 26, 2019 through Thursday March 28, 2019. She has a court hearing scheduled in Syracuse, New York on Wednesday, March 27, 2019; (4) that this appeal presents complex issues of federal law which largely turn on a close reading of the transcripts in the case and that counsel needs additional time to adequately prepare the opening brief based on the reasons stated above; and (5) that undersigned counsel has discussed this issue with the government, and the government does not oppose the requested extension pursuant to the following stipulations:

- a. That the appellant waives the requirement that her appeal be disposed of within thirty days, and agrees that such period be extended for nine days; and
- b. That the appellant agrees that the government's response to the appellant's opening brief be due no earlier than April 9, 2019; and
- c. That the appellant agrees not to seek release from confinement on the grounds that her appeal has not been disposed of within thirty days.

Counsel has discussed the above-stated stipulations with Ms. Manning. Ms. Manning agrees to the stipulations and expressly waives any claim that she should be released from confinement on the ground that her appeal has not been disposed of within thirty days.

For the above-stated reasons, Ms. Manning respectfully requests that the Court extend the deadline for her to file her opening brief to March 29, 2019, and the deadline for the government to file its response brief to April 9, 2019.

Respectfully submitted,

CHELSEA MANNING

By Counsel

Dated: March 26, 2019

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