

IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS

UNITED STATES

Appellee

v.

Private First Class (E-3)
JEROME J. FORREST,
United States Army

Appellant

MOTION FOR EXTENSION (2)

Docket No. ARMY 20200715

Tried at Fort Campbell, Kentucky, on
8 May 2019, 6 August 2019, 29
August 2019, 25 October 2019, 2
December 2019, 19 February 2020, 7
December 2020, 9-11 December
2020, and 14-16 December 2020
before a general court-martial
convened by the Commander,
Headquarters, Fort Campbell, Colonel
Matthew A. Calarco and Colonel
Jacqueline Tubbs, military judges,
presiding.

COME NOW the undersigned appellate defense counsel, pursuant to Rules 23
and 24 of this Court's Rules of Appellate Procedure, and move for a 30-day
extension of time until 16 October 2021 to file a Brief on Behalf of Appellant.

1. Consistent with Army Regulation 27-26, Rules of Professional
Conduct for Lawyers, the undersigned counsel request additional time
to ensure that counsel has diligently investigated, thoroughly
researched, and appropriately briefed the assignments of error in this
case in order to fulfill counsels' ethical obligation to represent the
appellant's interest.

2. This was a contested case. The transcript contains 1,273 pages and
an additional 1,509 pages of exhibits and allied documents (plus
multiple discs). The sentence was adjudged on 16 December 2020,
and it included a dishonorable discharge and confinement for life with
the eligibility for parole. Appellant is currently confined. Appellant
has been consulted and consents to this request.

3. The Brief on Behalf of Appellant is currently due on 16 September 2021. Appellant requests a 30-day extension of time to 16 October 2021 to file appellant's brief.

4. First undersigned counsel currently has ten cases pending a brief before this court (including four contested cases) and three before the Court of Appeals for the Armed Forces. First undersigned counsel also has eight cases submitted to this court pending Government response or decision and seven before the Court of Appeals for the Armed Forces. In the next two months, first undersigned counsel also has two oral arguments before this court and one before the Court of Appeals for the Armed Forces.

5. Undersigned counsel request additional time to review the record, research issues, investigate matters, confer with appellant, and accomplish supervisory review.

WHEREFORE, appellate defense counsel respectfully request that this court grant the instant motion.

PANEL NO. 4

MOTION FOR EXTENSION (2)

GRANTED: 


DENIED: _____

DATE: 10 SEP 2021


NANDOR F.R. ~~KISS~~

CPT, JA

Appellate Defense Counsel
Defense Appellate Division


RACHEL P. GORDIENKO
MAJ, JA
Branch Chief
Defense Appellate Division

Certificate of Filing and Service

I certify that a copy of the foregoing was electronically submitted to Army
Court and Government Appellate Division on 8 September 2021



Nandor F.R. Kiss /
Captain, Judge Advocate
Appellate Defense Counsel
Defense Appellate Division