

IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS

UNITED STATES

**MOTION FOR EXTENSION TO
FILE REPLY BRIEF**

Appellee

v.

Docket No. ARMY 20200391

Staff Sergeant (E-6)
LADONIES P. STRONG
United States Army
Appellant

Tried at Fort Stewart, Georgia, on 16
December 2019, 14-18 July 2020, and
20 July 2020, before a general
court-martial appointed by the
Commander, Fort Stewart, Georgia,
Colonel G. Bret Batdorff, military
judge, presiding.

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES ARMY COURT OF CRIMINAL APPEALS**

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 seven (7) day extension of time to file appellant's reply brief. Appellant's reply brief is currently due on 29 November 2021. Should this court grant appellant's motion, the new suspense would be 6 December 2021.

As good cause for granting this extension, the undersigned counsel hereby affirm that:

- (1) On 22 November 2021, the government filed its Brief on Behalf of Appellee.

- (2) The trial was contested;
- (3) The trial transcript contains 1,412 pages. The complete electronic record of trial contains an additional 986 pages of allied documents, exhibits, and attachments.
- (4) The approved sentence, adjudged on 20 July 2020, included confinement for three years, reduction to the grade of E-1, and a bad-conduct discharge;
- (5) Appellant is currently in confinement;
- (6) Appellant consents to this request for an extension;
- (7) Undersigned counsel request a seven day extension to have an opportunity to review the government's brief and to craft any appropriate response.
- (8) Undersigned counsel believe that the requested extension is in the best interest of appellant and that denying this request will materially prejudice appellant's appellate rights.

WHEREFORE, the undersigned counsel respectfully request a seven-day extension of time to file appellant's reply brief, to 6 December 2021.

PANEL NO. 3

MOTION FOR EXTENSION TO
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[REDACTED]

DENIED: _____

DATE: 29 November 2021

[REDACTED]

JOSEPH A. SEATON, JR.
CPT, JA
Appellate Defense Counsel
Defense Appellate Division

[REDACTED]

JOYCE C. LIU
MAJ, JA
Branch Chief
Defense Appellate Division

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was electronically submitted to the
Army Court and Government Appellate Division on 24 November 2021.



JOSEPH A. SEATON, JR.
CPT, JA
Appellate Defense Counsel
Defense Appellate Division