

IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS

UNITED STATES,

Appellee

**MOTION FOR EXTENSION TO  
FILE REPLY BRIEF**

v.

Docket No. ARMY 20220620

Private (E-2)

**MATTHEW Z. CONNER**

United States Army,

Appellant

Tried at Fort Campbell, Kentucky on 14 July and 5 December 2022, before a general court-martial appointed by the Commander, Headquarters, Fort Campbell, Colonel Travis Rogers and Colonel Sean S. Park, military judges, 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 14-day extension of time until 16 October 2023 to file a Reply 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 have 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. Appellant is currently in confinement. Appellant concurs with this request.

3. The Reply Brief on Behalf of Appellant is currently due on 2 October 2023. Appellant requests a 14-day extension of time to 16 October 2023 to file appellant's reply brief.
4. First undersigned counsel currently has twenty-four cases pending before this Court and eight cases pending before the Court of Appeals for the Armed Forces (CAAF).
5. First undersigned counsel is on leave until 1 October 2023. First undersigned counsel will also attend Lincoln Staff Ride and the mandatory brief on 26-28 September 2023.
6. Undersigned counsel requests additional time to review the record, review the government response, research issues, confer with appellant, and accomplish supervisory review.

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

PANEL NO. 3

MOTION FOR EXTENSION TO  
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GRANTED 

DENIED \_\_\_\_\_

DATE 03 October 2023



TUMENTUGS D. ARMSTRONG  
CPT, JA  
Appellate Defense Counsel  
Defense Appellate Division



MATTHEW S.. FIELDS  
CPT, JA  
Acting Branch Chief  
Defense Appellate Division

## **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was electronically submitted to the Army Court and Government Appellate Division on 26 September 2023.



TUMENTUGS D. ARMSTRONG  
Captain, Judge Advocate  
Appellate Defense Counsel  
Defense Appellate Division