

IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS

UNITED STATES

Appellee

**MOTION FOR EXTENSION TO  
FILE REPLY BRIEF**

v.

Docket No. ARMY 20230223

Sergeant (E-5)

**DAYTRON ABDULLAH,**

United States Army,

Appellant

Tried at Fort Carson, Colorado, on 20 April 2023, before a special court-martial appointed by the Commander, Headquarters, Fort Carson, Colonel Jacqueline L. Emanuel, 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 Internal Rules of Practice and Procedure, and moves this court to grant appellant's Motion for Extension of Time. The undersigned appellate defense counsel requests a 15-day extension of time, until 20 February 2024, to file a Reply Brief on Behalf of Appellant. The Reply Brief is currently due on 5 February 2024. Pursuant to Rule 24.1(b), the undersigned counsel asserts:

1. On 29 December 2023 appellant submitted his brief to this court. On 30 January 2024, the government filed the Brief on Behalf of Appellee.
2. Undersigned counsel was on leave out of the country from 25 to 30 January 2024; has a case in D.C. Superior Court on 31 January 2024; will be

**Panel 3**

out of the state from 1 to 4 February 2024, and has another case in D.C.

Superior Court on 13 February 2024.

3. Counsel requests additional time to ensure that all due diligence has been done to adequately review, investigate, research, and draft matters on behalf of appellant, as well as fulfill counsel's ethical obligation to represent his interests. Appellant consents to this extension request.

WHEREFORE, appellate defense counsel respectfully request that this court grant the instant motion for an extension until 20 February 2024.

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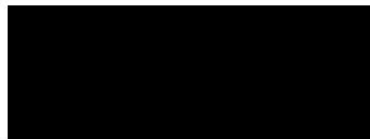
GRANTED: 

DENIED: \_\_\_\_\_

DATE: 2 February 2024



Amanda Williams  
Major, Judge Advocate  
Appellate Defense Counsel  
Defense Appellate Division



Mitchell D. Herniak  
Major, Judge Advocate  
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 January 31, 2024.



**MICHELLE L.W. SURRATT**  
**Paralegal Specialist**  
**Defense Appellate Division**

