

IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS

UNITED STATES,
Appellee

MOTION FOR EXTENSION (4)

v.

Docket No. ARMY 20220616

Staff Sergeant (E-6)
JOEL A. CORRINARD
United States Army,
Appellant

Tried at Fort Hood, Texas, on 23
January, 13 June, 29 November-2
December 2022, before a general court-
martial appointed by the Commander,
1st Cavalry Division, Colonel Maureen
A. Kohn, 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 move this court to grant appellant's Motion for Extension of Time. The undersigned appellate defense counsel requests a 30-day extension of time, until 2 February 2024, to file a Brief on Behalf of Appellant. The Brief on Behalf of Appellant is currently due on 3 January 2023. Pursuant to Rule 24.1(b), the first undersigned counsel asserts:

1. On 2 December 2022, an enlisted panel sitting as a general court-martial, found Staff Sergeant Corrinarad (appellant) guilty contrary to his pleas of two specifications of sexual assault and one specification of abusive sexual contact, in violation of Article 120, Uniform Code

of Military Justice, 10 U.S.C. § 920 [UCMJ]. The military judge sentenced appellant to seventy-two months of confinement and a dishonorable discharge. On 12 January 2023, the convening authority took no action. This court referred appellant's case on 7 June 2023.

2. Due to a conflict, the case was transferred to the first undersigned counsel on 10 August 2023. The transcript in this case is 633 pages, while additional documents and attachments are 1247 pages. On 27 November 2023, the undersigned counsel received addition 46 pages of Appellate Exhibits that were missing from the electronic records.

3. Currently, the first undersigned counsel has two oral arguments in January and three other filings due in January at the Court Appeals for the Armed Forces (CAAF). In addition, the counsel has twenty-three cases pending review at the Army Court. The undersigned counsel is currently awaiting an opinion from expert witnesses to assess a potential assignment of error.

4. Consistent with Army Regulation 27-26, Rules of Professional Conduct for Lawyers, undersigned counsel request additional time to ensure that counsel have diligently investigated, thoroughly researched, and appropriately briefed any assignments of error in this

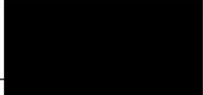
case to fulfill counsels' ethical obligation to represent the appellant's interest.

5. Appellant is still in confinement and concurs with this request.

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

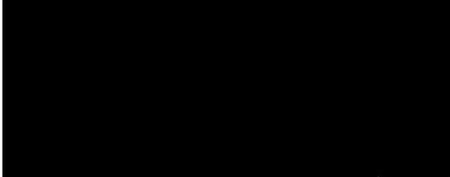
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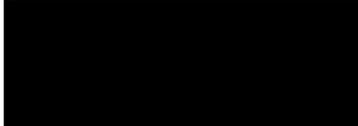
MOTION FOR EXTENSION (4)

GRANTED: 

DENIED: _____

DATE: 2 January 2024


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


MITCHELL D. HERNIAK
MAJ, JA
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 December 2023.



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