

IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS

UNITED STATES

Appellee

**MOTION FOR EXTENSION (1)  
TO FILE REPLY BRIEF**

v.

Docket No. ARMY 20230233

First Sergeant (E-8)  
**STEVEN K. WILSON,**  
United States Army,

Appellant

Tried at Vilseck, Germany, on  
3 March 2023, 30 March 2023, 26  
April 2023, 27-28 April 2023 before a  
special court-martial appointed by the  
Commander, 7th Army Training  
Command, Lieutenant Colonel  
Thomas Hynes, 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 this court to grant appellant's Motion for Extension of Time. The undersigned appellate defense counsel requests a 7-day extension of time until **12 March 2024** to file a Reply Brief on Behalf of Appellant. Pursuant to Rule 24.1(b), the undersigned counsel asserts:

1. On 28 April 2023, a military judge sitting as a special court-martial convicted appellant, contrary to his pleas, of one specification of kidnapping, one specification of assault consummated by a battery, one specification of communicating a threat, and one specification of provoking speech and gestures, in

violation of Articles 125, 128, 115, and 117, Uniform Code of Military Justice, 10 U.S.C. §§ 925, 928, 915, and 917 [UCMJ] respectively. (Statement of Trial Results). The military judge sentenced appellant to no punishment. (R. at 549).

2. Appellant's record of trial was received in the Defense Appellate Division on 5

3. October 2023 and is 551 pages long. Appellant filed his brief on 2 February 2024. The Government filed their brief on 27 February 2024. The current due date for the reply brief is **5 March 2024**.

4. The undersigned counsel is currently working fourteen cases pending before the Army Court of Criminal Appeals, including three pending briefs. Consistent with Army Reg. 27-26, Rules of Professional Conduct for Lawyers, undersigned counsel requests additional time to ensure that all due diligence has been done to adequately review, investigate, research, and brief the reply to Government's brief in this case and to fulfill counsel's ethical obligation to represent Appellant's interests.

5. Appellant concurs with this request for delay.

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

PANEL NO. 3

MOTION FOR  
EXTENSION TO FILE REPLY  
BRIEF (1)

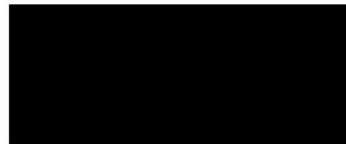
GRANTED:  \_\_\_\_\_

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

DATE: 1 March 2024



AMIR R. HAMDOUN  
Captain, 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 the Army  
Court of Criminal Appeals and the Government Appellate Division on 29  
February 2024.



Amir R. Hamdoun  
Captain, Judge Advocate  
Appellate Counsel  
Defense Appellate Division