

IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS

UNITED STATES,  
Appellee

**MOTION FOR EXTENSION (13)**

v.

Docket No. ARMY 20230520

Staff Sergeant (E-6)  
**RICHARD T. RIDDLE**  
United States Army,  
Appellant

Tried at Wheeler Army Airfield,  
Hawaii, on 27 January 2023, 13 March  
2023, 5-6 June 2023, 28 July 2023, and  
25-29 September 2023, before a  
general court-martial appointed by  
Commander, 8th Theater Sustainment  
Command, Lieutenant Colonel Robert  
E. Murdough, military judge, presiding.

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

COMES NOW the undersigned appellate defense counsel, pursuant to Rules 23 and 24 of this court's Rules of Appellate Procedure, and moves for a thirty-day extension of time until 16 October 2025 to file a Brief on Behalf of Appellant.

1. Appellant was convicted, contrary to his pleas, of a violation of Article 128, Uniform Code of Military Justice [UCMJ], as a lesser included offense of Article 120, and one specification of kidnapping. Appellant was also convicted, consistent with his pleas, of one specification of Article 128; several specifications of Article 91; two specifications of Article 90, four specifications of Article 89; two specifications of Article 86; and one

specification of Article 134. Appellant was sentenced to more than 116 months confinement and remains incarcerated.

2. The complete electronic record of trial is 2,746 pages, including multiple trial exhibits and 110 appellate exhibits. Numerous issues were contested, including speedy trial, witness production, expert requests, evidentiary matters, and the panel instructions.

3. Appellant's brief is currently due on 16 September 2025. Appellant requests a thirty-day extension of time until 16 October 2025.

4. Appellant consents to this extension request.

5. Good cause exists for this extension. Both undersigned counsels assumed responsibility for this case in March 2025. In consultation with appellant, counsel received a large cache of documents from one of appellant's trial defense counsel which indicated more investigation is needed into the facts and circumstances of appellant's case.

6. The first undersigned detailed defense counsel, CPT Jessica Adler, currently has thirteen cases before this court, six of which are contested trials, in which briefs have yet to be filed. In the past month, she has reviewed the record of trial and drafted or assisted with drafting the briefs that were filed in *United States v. Agustin*, ARMY Dkt. No. 20240460, on 18 August 2025 (Brief on Behalf of Appellant- P1); *United States v. Campbell*, USCA Dkt. No. 25-0242/AR, Crim.

App. No. 20240596 on 18 August 2025 (Petition and Supplement to the Petition); *United States v. Mendoza*, USCA Dkt. No. 25-0244/ AR, Crim. App. No. 20210647 on 20 August 2025 (Certificate for Review); *United States v. Rojas-Sanchez*, ARMY Dkt. No. 20240511 on 20 August 2025 (Brief on Behalf of Appellant- P1); *United States v. Ayuso*, ARMY Dkt. No. 20240332 on 26 August 2025 (Brief on Behalf of Appellant-Six AE's, Petition for a New Trial and Motion to Attach); *United States v. Lykins*, USCA Dkt. No. 25-0429/ AR on 26 August 2025 (Petition and Supplement to the Petition); *United States v. Halchimai*, USCA Dkt No. 25-0251/ AR, Crim. App. No. 20220429 on 26 August 2025 (Petition); *United States v. Garcia*, USCA Dkt. No. 0258/ AR, Crim. App No. 20240354 on 4 September 2025 (Petition and Supplement to the Petition); *United States v. Moon*, ARMY Dkt. No. 20240620 on 8 September 2025 (Motion to Withdraw); and *United States v. Hurtado*, USCA Dkt No. 25-0212/ AR, Crim. App. No. 20240609 on 10 September 2025 (Joint Appendix). She participated in one round table and two moots at DAD. She was on leave from 8 August – 17 August 2025. She is currently on convalescent leave as she had knee surgery on 27 August 2025.

Second undersigned counsel, Mr. Jonathan Potter, is the lead attorney in three capital cases: *United States v. Hasan*, *United States v. Hennis*, and *United States v. Akbar*, all of which have required extensive work and coordination in the past two months. Additionally, he completed a brief for the Court of Appeals for

the Armed Forces (CAAF) in *United States v. Holmes* last week, is working on the government writ in *United States v. Venghaus*, as well as working on completing a brief in *United States v. Gonzalez*. He is also detailed to five other active cases and has supervisory responsibilities on more than twenty other cases in the DAD.

Additionally, Mr. Potter is preparing to teach at the Joint Appellate Advocacy Training (JAAT) in late September and will be TDY to Fort Leavenworth on 11-12 September 2025 and also for this court's Project Outreach argument at the University of Florida School of Law on 23-25 September 2025.

Both undersigned counsels have completed a review of the record.

Additionally, DAD is down six authorized captains and operating at 61% strength.

7. Consistent with Army Reg. 27-26, Legal Services: Rules of Professional Conduct for Lawyers (28 Jun. 2018), the undersigned counsel requests additional time to review the file in order to fulfill counsel's ethical obligation to represent appellant's interest as they are both new counsel to this case.

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

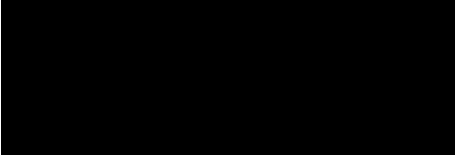
PANEL NO. 2

MOTION FOR EXTENSION (13)

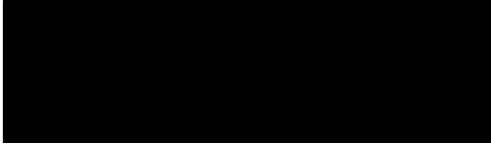
GRANTED: \_\_\_\_\_

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

DATE: \_\_\_\_\_



JESSICA A. ADLER  
Captain, Judge Advocate  
Appellate Defense Counsel  
Defense Appellate Division



JONATHAN F. POTTER  
Senior Appellate Counsel  
Defense Appellate Division

**CERTIFICATE OF FILING AND SERVICE**

I certify that a copy of the foregoing was electronically filed with the Army Court and Government Appellate Division on September 10, 2025.



MELINDA J. JOHNSON  
Paralegal Specialist  
Defense Appellate Division