

**IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS**

UNITED STATES

Appellee

**MOTION FOR LEAVE TO FILE  
SUPPLEMENT BRIEF ON  
SPECIFIED ISSUES OUT OF  
TIME**

v.

Docket No. ARMY 20240592

Sergeant (E-5)  
**TRENT V. GOINES,**  
United States Army,

Appellant

Tried at Fort Riley, Kansas on 12  
March, 31 July, 14 November, and 2-5  
December by a general court-martial  
convened by Commander, 1st Infantry  
Division, Colonel Scott Oravec and  
Colonel Alex Pickands, 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 this court to grant appellant's Motion for Extension of Time. The undersigned appellate defense counsel request leave of this court to file his supplemental brief in response to this court's specified issues. The Brief on Behalf of Appellant is currently due on 25 February 2026. Pursuant to Rule 24.1(b), the undersigned counsel assert:

On 12 March, 31 July, 14 November, and 2-5 December appellant was tried by a general court-martial (Enlisted Panel) at Fort Riley, Kansas. Appellant was convicted, contrary to his pleas, of one specification of Sexual Assault in violation

of Article 120, UCMJ, 10 U.S.C.A. § 920. (R. at 608). The military judge sentenced appellant to be reduced to the grade of E-1, confined for 15 months, and dishonorably discharged. (R. at 664). The convening authority took no action on the findings and approved the sentence and disapproved appellant's request for waiver of automatic forfeitures. (Action). This court docketed appellant's case on 2 May 2025. (Referral and Designation of Counsel).

2. Appellant's counsel filed a brief on his behalf on 08 September 2025. The government (appellee) filed a brief on 07 January 2026. Appellant submitted a reply brief on 12 January 2026. This court specified issues on 11 February 2026, with a response from appellant due on 25 February 2026.

3. Out of Time Explanation. Undersigned counsel is filing this motion out of time due to a misunderstanding by Defense Appellate Division counsel. The brief is complete and ready to file at this time. There is no prejudice to the appellee as their brief is not due until 14 days after appellant's brief is filed with the court.

4. Consistent with Army Reg. 27-26, Rules of Professional Conduct for Lawyers, undersigned request 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.

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



PANEL NO. 2

MOTION FOR  
OUT OF TIME FILING

Beau O. Watkins  
Major, Judge Advocate  
Branch Chief  
Defense Appellate Division

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

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

DATE: 2 March 2026

Denied for lack of good cause. ACCA Rule 24.3. Any future motions for reconsideration and extension to file (ACCA Rule 24.1) must be accompanied by the brief to be filed.

**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 February 26, 2026.



MELINDA J. JOHNSON  
Paralegal Specialist  
Defense Appellate Division

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**Subject:** RE: Goines-20240592-Motion to File Supplemental Brief on Specified Issues Out of Time (260226) - [UNCLASSIFIED]  
**Date:** Friday, February 27, 2026 4:04:00 PM  
**Attachments:** [Goines-20240592-Motion to File Supplemental Brief on Specified Issues Out of Time-\(260226\).pdf](#)

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**UNCLASSIFIED**

Your pleading is in compliance with the Court's Rules of Practice and Procedure, and the pleading is accepted.

Very respectfully,

Office of the U.S. Army Clerk of Court  
9275 Gunston Road, Bldg. 1450  
Fort Belvoir, VA 22060-5546

**UNCLASSIFIED**

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**From:** Johnson, Melinda J CIV USARMY HQDA OTJAG (USA) <melinda.j.johnson.civ@army.mil>  
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v/r

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