

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

UNITED STATES

Appellee

**MOTION FOR EXTENSION (3)**

v.

Docket No. ARMY 20250304

Specialist (E-4)

**MASON L. BYNUM,**

United States Army,

Appellant

Tried at Fort Bliss, Texas, on 4 June 2025, before a general court-martial appointed by the Commander, 1st Armored Division, Lieutenant Colonel Matthew Rick, 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 request a 30-day extension of time until 14 May 2026 to file a Brief on Behalf of Appellant. The Brief on Behalf of Appellant is currently due on 14 April 2026. Pursuant to Rule 24.1(b), the undersigned counsel assert:

1. On 4 June 2025, a military judge sitting as a general court-martial convicted appellant in accordance with his pleas, of possession of child porn. (R. at 56; Charge Sheet). On 4 June 2025, the forum sentenced appellant to be reduced to the grade of E-1, to be confined for 365 days, and to be dishonorably discharged from the service. (R. at 85).

On 27 June 2025, the convening authority approved the findings and adjudged sentence. (Convening Authority Action). On 1 July 2025, the military judge entered Judgment. (Judgment of the Court). This court docketed appellant's case on 16 October 2025. (Referral and Designation of Counsel).

2. Appellant's record of trial was received in the Defense Appellate Division on 16 October 2025, and is 86 pages long. The current due date is 14 April 2026. Appellant concurs with this request for delay.

3. Good cause exists for this extension. In the ninety days comprising extension, the first undersigned counsel is currently working or assisting on the following cases at the Army Court of Criminal Appeals and the Court of Appeals for the Armed Forces: *United States v. Barclift*, 20250370, *United States v. Bynum*, 20250304; *United States v. Davis*, 20250157, *United States v. Fontenont*, 20240473; *United States v. Johnson*, 20250293, *United States v. Malcolm*, 20250242, *United States v. Moses*, 20250407, *United States v. Snodgrass*, 20250397, *United States v. Tate*, 20240351, *United States v. Taylor*, 20240167, and *United States v. Verhulst*, 20250412. CPT Hope currently has eleven cases before this court. Furthermore, the first undersigned counsel has filed three substantive briefs, *United States v. Robinson*, Crim. App. Dkt. No. 20230640, USCA Dkt. No. 26-0130/AR, *United States v. Ferrufino*, 20250081, and *United States v.*


*Overton*, 20240580 at Army Court of Criminal Appeals and the Court of Appeals for the Armed Forces in the past four weeks.

4. Consistent with counsel’s state bar rules and 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. 3

MOTION FOR  
EXTENSION (3)

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

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

DATE: 9 April 2026



Jon C. Hope  
Major, Judge Advocate  
Appellate Defense Counsel  
Defense Appellate Division



Beau O. Watkins  
Major, Judge Advocate  
Branch Chief  
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 April 8, 2026.



MELINDA J. JOHNSON  
Paralegal Specialist  
Defense Appellate Division