IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS

UNITED STATES, Appellee v. Sergeant (E-5) **TREVAR D. TINSLEY** United States Army, Appellant	APPELLANT'S MOTION FOR EXTENSION ON REPLY BRIEF Docket No. ARMY 20200337 Tried at Fort Bragg, North Carolina, on 14 April, 22-24 June, and 1 July 2020, before a general court-martial appointed by Commander, United States Army John F. Kennedy Special Warfare Center and School, Colonel Charles Pritchard and Lieutenant Colonel Christopher Martin, 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 for a 30-day extension of time until 23 September 2021 to file a Reply Brief on Behalf of Appellant.

1. Consistent with Army Reg. 27-26, Rules of Professional Conduct for Lawyers, undersigned counsel request additional time to ensure that all due diligence has been done to receive permission to copy the Appellee's sealed Brief, mail it to civilian counsel, review and reply to the issues in this case and to fulfil counsel's ethical obligation to represent Appellant's interest. The reply brief will also likely be sealed, which requires additional processing.

2. The record of trial in this contested case is 645 pages. The approved sentence was adjudged on 1 July 2020, and it includes a reprimand, a

dishonorable discharge, and reduction to Private E-1. Appellee's Brief is 45 pages long, with 24 pages containing sealed material. Appellant concurs with the request for an extension.

3. The current due date is 31 August 2021. Defense counsel requests additional time to review the brief, research issues, and confer with appellant.

4. The first undersigned defense counsel and military appellate defense counsel have been on leave. The undersigned military defense counsel has 12 cases pending briefing before this court, and 7 pending deadlines in August and September before the Court of Appeals for the Armed Forces.

5. Counsel anticipate briefing multiple substantive points in reply.

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

PANEL NO. 3

APPELLANT'S MOTION
FOR REPLY EXTENSION

[redacted]

GRANTED: [redacted]

DENIED: _____

DATE: 26 AUG 2021

FOR
Michael Millios
Civilian Appellate Defense Counsel
[redacted]

[redacted]

LAUREN M. TEEL
CPT, JA
Appellate Defense Counsel

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was electronically submitted to Army Court and Government Appellate Division on August 25, 2021.

[redacted]

MELINDA J. JOHNSON
Paralegal Specialist
Defense Appellate Division
[redacted]