

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

DONALD J. TRUMP,

Defendant.

Case No. 1:23-cr-00257-TSC

**PRESIDENT TRUMP’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
OPPOSITION TO THE SPECIAL COUNSEL’S
CLASSIFIED CIPA § 5 MOTION TO STRIKE**

On November 10, 2023, the Special Counsel’s Office filed a classified Motion to Strike President Trump’s notice pursuant to CIPA § 5 (“Motion to Strike”). President Trump’s opposition is currently due Friday, November 24, 2023.¹ President Trump respectfully requests that the Court grant an extension of time of one business day, to November 27, 2023, to file said opposition. The reason for this request is that counsel is traveling during the Thanksgiving holiday weekend, and, although counsel has spent several days in the secure facility in Washington, D.C. recently, we are not able to return to Washington, D.C. until after the Friday, November 24, 2023 due date. Separately, as the Court is aware, President Trump is filing motions to compel on Monday,

¹ On November 20, counsel sought and received consent from the Special Counsel’s Office for the relief requested herein. The Special Counsel’s Office asked that the following representation be made regarding its position:

Counsel for the government consents to this request given the unique logistical challenge of defense counsel traveling to Washington, D.C. on the Friday after Thanksgiving to use the SCIF and make a classified filing with the CISO. If the Court denies the motion, however, the government will be in the SCIF on Friday as planned to receive the defendant’s filing.

November 27, 2023, and certain portions of our opposition to the Motion to Strike necessarily reference and rely on our motions to compel.

For these reasons, President Trump respectfully requests an extension of time of one business day within which to file his opposition to the Motion to Strike.

Dated: November 21, 2023

Respectfully submitted,

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