

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 2:22-CR-76
	)	JUDGE GREER
CHAD BRANDON THOMAS	)	

UNITED STATES' MOTION FOR ENLARGEMENT

The United States, through the United States Attorney for the Eastern District of Tennessee and pursuant to Rule 45(b)(1), respectfully requests that the Court grant an enlargement of time to respond to defendant's *pro se* motion to withdraw his plea filed on March 9, 2023 [Doc. 41]. The United States is in the process of ordering the transcript of defendant's change-of-plea hearing on August 8, 2022, and is awaiting receipt of that transcript. The United States requests an enlargement of three days after receipt of the change-of-plea transcript to file its response because defendant's sworn testimony during that hearing will be relevant to defendant's motion.

Defendant filed a prior *pro se* motion to withdraw his plea on January 3, 2023 [Doc. 33]. The Court denied the prior motion (without hearing) on January 5, 2023 [Doc. 35] because the motion was not filed by defendant's counsel. While defendant's new motion likewise is not filed by counsel, the Court has scheduled a hearing on the new motion for April 10, 2023 [Doc. 45]. The United States intends to respond in opposition to the motion but is awaiting receipt of the change-of-plea transcript to do so.

WHEREFORE, the United States respectfully requests that the Court grant an enlargement until three days after the United States' receipt of the change-of-plea transcript to file its response in opposition to defendant's *pro se* motion to withdraw his plea.

Respectfully submitted, this the 21st day of March, 2023.

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