

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

Norfolk Division

UNITED STATES OF AMERICA

v.

LETITIA A. JAMES,

Defendant.

* * * * *

*
*
* Case No. 2:25-cr-122-JKW-DEM
*
*
*
*
*
*

**CONSENT MOTION FOR EXTENSION OF
TIME TO FILE PRETRIAL MOTIONS**

Letitia A. James, by and through undersigned counsel, and with consent of the government, respectfully moves this Court for the entry of an order extending the time for the defense to file pretrial motions. The defense is asking that the current deadline of November 17, 2025, be extended two weeks, to December 1, 2025, based on the following:

1. Ms. James is charged in an indictment filed on October 9, 2025, alleging counts of bank fraud in violation of 18 U.S.C. § 1344 (Count One) and false statements to a financial institution in violation of 18 U.S.C. § 1014 (Count Two). ECF No 1.

2. The undersigned appeared on behalf of Ms. James on October 16, 2025. ECF Nos. 5 and 6.

3. The parties appeared before Judge Walker for an arraignment and initial appearance on October 24, 2025. ECF No. 24. Ms. James pleaded not guilty to all charges and requested a trial by jury. *Id.* The Court scheduled the case for trial on January 26, 2025, outside the Speedy Trial Act cut-off and by agreement of the parties. *Id.* The Court also set a pretrial motions cutoff date, other than for Defendant's motion to dismiss for vindictive and selective prosecution, of

November 17, 2025. *Id.*

4. A scheduling order, including for discovery in this case, was entered on October 29, 2025, *see* ECF No. 32, which set the government's discovery deadline for November 12, 2025.

5. Since the initial appearance, the government has produced a significant amount of electronic discovery to the defense, spanning five production volumes containing, in total, more than 17,000 documents and 115,000 pages. The latest production (Vol. 05) alone, received on Wednesday, November 12, included nearly two terabytes of data.

6. Due to the large volume of documents produced, and the extensive time it is taking our eDiscovery vendor to upload these documents into a reviewable format and will take counsel to review this material, Ms. James respectfully requests that the pretrial motions cutoff date be extended an additional two weeks, to December 1, 2025. Neither party will be prejudiced by the extension and the additional time will give defense counsel adequate time to review the just-produced discovery to inform any additional pretrial motions, if necessary.¹

7. The briefing schedule for pretrial motions will otherwise remain the same as contemplated by the local rules for this District, including, but not limited to, the timing set forth in Local Criminal Rule 47(F).

8. Counsel for both parties have conferred, and the government consents to this motion and the entry of the proposed order filed herewith.

¹ The Defense still intends to file certain already-prepared pretrial motions on Monday, November 17, 2025, but respectfully makes this motion to extend the deadline in the event additional pretrial motions, such as a motion to compel discovery, are necessary.

WHEREFORE, Ms. James respectfully moves for the entry of an order granting this motion and extending the time for her to file additional other pretrial motions to December 1, 2025.

Dated: November 14, 2025

Respectfully submitted,

/s/ Abbe David Lowell

Abbe David Lowell (*admitted pro hac vice*)
David A. Kolansky (*admitted pro hac vice*)
Isabella M. Oishi (*admitted pro hac vice*)
John P. Bolen (*admitted pro hac vice*)
Schuyler J. Standley (*admitted pro hac vice*)
LOWELL & ASSOCIATES, PLLC
1250 H Street NW, Suite 250
Washington, DC 20005
Tel: 202-964-6110
Fax: 202-964-6116
ALowellpublicoutreach@lowellandassociates.com
DKolansky@lowellandassociates.com
IOishi@lowellandassociates.com

/s/ Andrew Bosse

Andrew Bosse (VSB No. 98616)
BAUGHMAN KROUP BOSSE PLLC
500 E. Main Street, Suite 1400
Norfolk, VA 23510
Tel: (757) 916-5771
ABosse@bkbfirm.com

Attorneys for Letitia A. James

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

Norfolk Division

UNITED STATES OF AMERICA

v.

LETITIA A. JAMES,

Defendant.

* * * * *

*
*
* Case No. 2:25-cr-122-JKW-DEM
*
*
*
*
*
*

ORDER

On the consented-to motion of the defendant, by counsel, for an order requesting an extension of time to file pretrial motions from November 17, 2025, to December 1, 2025, and for good cause shown,

It is hereby **ORDERED** that the defendant's motion is granted and the deadline for pretrial motions is extended to December 1, 2025.

November ____, 2025
Norfolk, Virginia

Hon. Jamar K. Walker
United States District Court Judge