

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-80116-CR-CANNON

UNITED STATES OF AMERICA

vs.

RYAN WESLEY ROUTH,

Defendant.

_____ /

UNOPPOSED MOTION TO EXTEND INITIAL DISCOVERY DEADLINE

The United States of America, by and through the undersigned Assistant United States Attorney, moves this Honorable Court for entry of an Order briefly extending the initial discovery deadline in the above-captioned matter from Tuesday, October 15, 2024, to Thursday, October 17, 2024. In support of this Motion, the United States offers the following:

1. On September 24, 2024, a federal grand jury empaneled in the Southern District of Florida returned a five-count indictment against Routh [ECF No. 21]. The indictment charges him with the attempted assassination of a major Presidential candidate, in violation of Title 18, United States Code, Section 351(c) (Count 1); possessing a firearm during a crime of violence, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) (Count 2); assaulting a federal officer, in violation of Title 18, United States Code, Sections 111(a)(1) and (b) (Count 3); possession of a firearm and ammunition by a convicted felon, in violation of Title 18, United States Code, Section 922(g)(1) (Count 4); and possession of a firearm with an obliterated serial number, in violation of Title 18, United States Code, Section 922(k) (Count 5) [ECF No. 21].

2. On September 30, 2024, United States Magistrate Judge Bruce E. Reinhart presided over Routh's arraignment [ECF No. 28]. On this day, Judge Reinhart issued the Standing

Discovery Order, which states the following:

The defendant(s) having been arraigned this date in open Court, it is Ordered that within 14 days of the date of this order that all parties to this action shall review and comply with Southern District of Florida Local Rules 88.10 (Criminal Discovery), and 88.9(c) (Motions in Criminal Cases). Upon a sufficient showing, the Court may at any time, upon a properly filed motion, order that the discovery or inspection provided for by this Standing Order be denied, restricted or deferred, or make such other order as is appropriate. It is expected by the Court, however, that counsel for both sides shall make a good faith effort to comply with the letter and spirit of this Standing Order. It shall be the continuing duty of counsel for both sides to immediately reveal to opposing counsel all newly discovered information or other material within the scope of Local Rule 88.10.

Id. Accordingly, due to the federal holiday on Monday, October 14, 2024, the initial discovery deadline is currently scheduled for Tuesday, October 15, 2024.

3. On October 1, 2024, this Court issued an Omnibus Order setting the trial date to November 18, 2024 [ECF No. 29].

4. On October 2, 2024, the United States filed an unopposed motion to designate this case as complex under the Speedy Trial Act [ECF No. 30]. In support of its motion, the United States represented that the investigation in this criminal matter has resulted in the interview of hundreds of witnesses; the seizure of hundreds of items of discovery, including multiple electronic devices; multiple forensic examinations; and the issuance of over one hundred subpoenas. Id. at 2. In total, the United States anticipates that the discovery in this matter will entail approximately several thousand terabytes of digital review. Id.

5. Earlier this week the National Oceanic and Atmospheric Administration (NOAA) National Hurricane Center (NHC) and Central Pacific Hurricane Center (CPHC) issued a hurricane warning for the Florida east coast from the St. Lucie/Martin County line northward, and a hurricane

watch from the St. Lucie/Martin County line to the Palm Beach/Martin County line.¹ Due to the unpredictability of Hurricane Milton, the United States Attorney's Office for the Southern District of Florida, as well as the Federal Bureau of Investigation (FBI) offices in the area, closed their respective offices on Wednesday, October 9, 2024, and Thursday, October 10, 2024.

6. Since the issuance of the Standing Discovery Order, the United States has diligently been working to compile and organize the discovery in this matter. However, due to the office closures this week in response to Hurricane Milton, the United States will lose multiple business days that would otherwise be devoted towards discovery preparation. In light of this, the United States is respectfully requesting a brief extension of the initial discovery deadline to Thursday, October 17, 2024.

7. Pursuant to Local Rule 88.9, the undersigned has conferred with counsel for defendant Ryan Wesley Routh, Assistant Federal Public Defender Kristy Militello, and she does not oppose this motion.²

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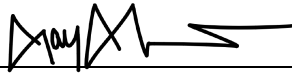
¹ <https://www.nhc.noaa.gov/text/refresh/MIATCPAT4+shtml/072354.shtml>.

² The defense will be providing an external hard drive tomorrow, Friday, October 11, 2024, so that the United States can begin the process of copying the discovery for defense. The parties are in continued discussions regarding the best way of providing the defense access to the voluminous digital evidence in this case. The United States is aware of its continuing discovery obligations and will continue to provide discovery in a timely manner.

WHEREFORE, the United States respectfully requests that this Court enter an Order extending the initial discovery deadline to Thursday, October 17, 2024.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By:  _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 10, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

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AJAY J. ALEXANDER
Assistant United States Attorney