

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

Hon. Claire C. Cecchi

MATTHEW BRENT GOETTSCHE,  
[DEFENDANT TWO REDACTED],  
JOBADIAH SINCLAIR WEEKS,  
JOSEPH FRANK ABEL, and  
SILVIU CATALIN BALACI

CRIMINAL NO.: 19-cr-877-CCC

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**DEFENDANT JOBADIAH SINCLAIR WEEKS' UNOPPOSED  
MOTION FOR ENLARGEMENT OF PAGE LIMIT AND  
INCORPORATED MEMORANDUM OF LAW**

Pursuant to Local Rule 7.2(b), (d), Defendant Jobadiah Sinclair Weeks moves for an enlargement of page limit for a Motion to review and revoke the pretrial detention order issued by U.S. Magistrate Judge Michael A. Hammer on February 14, 2020. Mr. Weeks respectfully requests an enlargement to no more than 40 pages in 12-point proportional font. Such an enlargement will allow a comprehensive rebuttal of facts presented in the Order and introduce the myriad circumstances that have since changed. Mr. Weeks has conferred with counsel for the government and they do not oppose this motion.

For the foregoing reasons, Mr. Weeks respectfully files this motion for an enlargement of page limit to no more than 40 pages, 12-point proportional font, for a Motion to review and revoke

the pretrial detention order, and for such other relief as the Court deems proper. The Motion will be filed at least 24 days prior to the requested motion day.

Dated: April 24, 2020

CARLTON FIELDS

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*Counsel for Jobadiah Sinclair Weeks*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 24, 2020, I filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will serve an electronic copy to all counsel of record.

/s/ Michael L. Yaeger  
Michael L. Yaeger, Esq.