

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 25-232 (JRT/JFD)

UNITED STATES OF AMERICA,

Plaintiff,

**GOVERNMENT'S MOTION FOR  
EXTENSION OF TIME**

v.

TAVON TARRELL TIMBERLAKE,

Defendant.

The United States of America, by and through its attorneys, Daniel N. Rosen, United States Attorney for the District of Minnesota, and Assistant United States Attorney William C. Mattessich, hereby moves the Court for permission to file a response out of time to the defendant's Motion to Dismiss the Indictment (ECF No. 22). The government seeks an extension until Thursday, February 7, to file a response. The defendant opposes this motion.

In support of its motion, the United States alleges and states the following:

1. The defendant was charged by Indictment on June 10, 2025. (ECF No. 1). On August 15, 2025, the government filed a motion to continue trial in this matter. (ECF No. 19). No trial date has yet been set.
2. On January 9, 2026, the defendant filed this Motion to Dismiss the Indictment. (ECF No. 22.) The government filed a motion for extension of time to respond to that motion on January, 15, 2026, citing a family medical emergency for government's counsel. (ECF No. 24). That motion was granted. (ECF No. 25).

3. Due to that medical emergency and difficulties arising with staffing turnover in the United States Attorney's Office, government's counsel were unable to confer regarding coverage for the motions response. Counsel who picked up coverage for this motion is currently in trial.
4. The defendant was ordered detained on a petition for a supervised release violation on the same facts forming the basis for the indictment. *See* Criminal Nos. 19-148 (NEB/KMM) and 22-364 (NEB/ECW). His alleged violations would need to be resolved before he could be released from detention. As a result, the defendant will suffer no prejudice from this requested short extension.

Dated: February 4, 2026

Respectfully Submitted,

DANIEL N. ROSEN  
Acting United States Attorney

*s/ William C. Mattessich*  
BY: WILLIAM C. MATTESSICH  
Assistant United States Attorney