

**IN THE UNITED STATES ARMY  
COURT OF CRIMINAL APPEALS**

U N I T E D   S T A T E S ,

CONSOLIDATED MOTION FOR  
RECONSIDERATION OF  
DETERMINATION OF FINAL  
EXTENSION AND MOTION FOR  
FINAL EXTENSION (17)

Appellee

Docket No. ARMY 20130739

v.

Private First Class  
**CHELSEA E. MANNING,**  
United States Army,  
Appellant

Tried at Fort Meade, Maryland,  
on 23 February, 15-16 March,  
24-26 April, 6-8, 25 June, 16-  
19 July, 28-30 August, 2, 12,  
and 17-18 October, 7-8, and 27  
November-2, 5-7, and 10-11  
December 2012, 8-9 and 16  
January, 26 February-1, 8  
March, 10 April, 7-8 and 21  
May, 3-5, 10-12, 17-18 and 25-  
28 June, 1-2, 8-10, 15, 18-19,  
25-26, and 28 July-2, 5-9, 12-  
14, 16, and 19-21 August 2013,  
before a general court-martial  
appointed by Commander, United  
States Army Military District  
of Washington, Colonel Denise  
Lind, Military Judge,  
presiding.

TO THE HONORABLE, THE JUDGES OF THE UNITED STATES  
ARMY COURT OF CRIMINAL APPEALS

COME NOW the undersigned appellate defense counsel,  
pursuant to Rules 23 and 24 of this Court's Rules of  
Practice and Procedure, and move for a final extension of  
time until 18 May 2016 to file a Brief on Behalf of  
Appellant.

1. The record of trial in this case has over 13,000 pages. This was a contested case involving twenty-two specifications, 667 appellate exhibits, 209 prosecution exhibits, and seventy-seven defense exhibits. Many of these exhibits, as well as hundreds of pages of the record, are classified Secret/NOFORN.

2. The approved sentence, adjudged on 21 August 2013, includes a dishonorable discharge, confinement for thirty-five years, forfeiture of all pay and allowances, and reduction to the grade of E-1. Undersigned counsel have thoroughly discussed the timeline for filing this brief with appellant, who agrees this extension is necessary for adequate representation in this case.

3. The record of trial was received at the Defense Appellate Division on 25 April 2014, and the current due date is 15 February 2016. This court designated the last extension as the final extension granted.

4. Since this court's approval of the last extension, it has become apparent that several logistical issues involved in the preparation of this brief are more time-consuming than originally understood. Undersigned military defense counsel spent the week of 11 January 2016 drafting the classified supplement to this brief in this court's secure room. Military defense counsel will require at

counsel can meet with the client in the Leavenworth secure room is early May. This trip will again require the extensive logistical coordination necessary to courier classified material from Fort Belvoir to Fort Leavenworth, including coordination with the court's security expert, the defense security expert, the USDB, and the Leavenworth OSJA.

7. In addition to the classified supplement to the brief, undersigned appellate defense counsel will require at least another two months to complete the unclassified portion of the brief, including research, drafting, and editing. Currently, appellate defense counsel believe this brief will be between 200 and 250 pages in length given the factual complexity of PFC Manning's court-martial.

8. Other caseload requirements and duties also affect the ability for undersigned counsel to file a brief in this case. Military defense counsel is currently assigned thirty-one other cases at various stages of appeal. *United States v. Medrano* is scheduled for oral argument on 17 February 2016, two days after the current due date for this brief. Ms. Hollander has a federal habeas hearing in Washington, D.C., on 17 February 2016; a federal sentencing hearing in New Mexico on 17 March 2016; and is scheduled

for international business travel from 8-15 March 2016 and from 12-22 April 2016.

WHEREFORE, appellate defense counsel respectfully request that this Court grant the instant motion.

PANEL NO. 3

MOTION FOR RECONSIDERATION  
OF DETERMINATION OF FINAL  
EXTENSION:

GRANTED: KJT

DENIED: \_\_\_\_\_

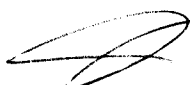
DATE: FEB -4 2016

MOTION FOR EXTENSION (17):


GRANTED: KJT FINAL


DENIED: \_\_\_\_\_

DATE: FEB -4 2016

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*FILED*  
FEB 4 2016  
12:33

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Appellate Defense Counsel

CERTIFICATE OF SERVICE

UNITED STATES v. Manning


Army No. 20130739

Brief on Behalf of Appellant \_\_\_\_\_

Motion X

Other \_\_\_\_\_

I certify that a copy of the foregoing was delivered  
to the Court and Government Appellate Division on January 27,  
2016.

  
MELINDA J JOHNSON  
Paralegal Specialist  
Defense Appellate Division