

Respectfully submitted,

[REDACTED]

SAMANTHA P. GOLSETH, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

[REDACTED]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Appellate Government Division on 1 May 2023.

Respectfully submitted,

A solid black rectangular redaction box covering the signature of Samantha P. Golseth.

SAMANTHA P. GOLSETH, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

A solid black rectangular redaction box covering the contact information, including the address and phone number.

**UNITED STATES AIR FORCE
COURT OF CRIMINAL APPEALS**

UNITED STATES)	No. ACM 40408
<i>Appellee</i>)	
)	
v.)	
)	NOTICE OF DOCKETING
Jacob I. CHRISTENSEN)	
Master Sergeant (E-7))	
U.S. Air Force)	
<i>Appellant</i>)	

A notice of direct appeal pursuant to Article 66(b)(1)(A), Uniform Code of Military Justice, 10 U.S.C. § 866(b)(1)(A), was submitted by Appellant and received by this court in the above-styled case on 1 May 2023. On 1 May 2023, the record of trial was received by the Military Appellate Records Branch.

Accordingly, it is by the court on this 1st day of May, 2023,

ORDERED:

The case in the above-styled matter is referred to Panel 2. Briefs will be filed in accordance with this court's Rules of Practice and Procedure. *See* A.F. Ct. Crim. App. R. 18, 23.3(m).



FOR THE COURT



FLEMING E. KEEFE, Capt, USAF
Deputy Clerk of the Court

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	APPELLANT’S MOTION FOR
<i>Appellee,</i>)	ENLARGEMENT OF TIME (FIRST)
)	
v.)	Before Panel No. 2
)	
Master Sergeant (E-7))	
JACOB I. CHRISTENSEN,)	No. ACM 40408
United States Air Force)	
<i>Appellant</i>)	23 June 2023

**TO THE HONORABLE, THE JUDGES OF THE UNITED STATES
AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(1) and (2) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time (EOT) to file Assignments of Error. Appellant requests an enlargement for a period of 60 days, which will end on **29 August 2023**. The record of trial was docketed with this Court on 1 May 2023. From the date of docketing to the present date, 53 days have elapsed. On the date requested, 120 days will have elapsed.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,

[REDACTED]

SAMANTHA P. GOLSETH, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

[REDACTED]

CERTIFICATE OF FILING AND SERVICE

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SAMANTHA P. GOLSETH, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



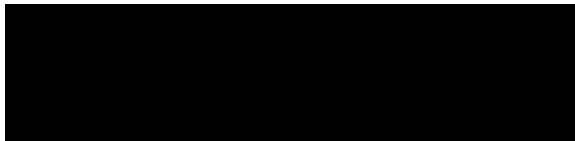
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Master Sergeant (E-7))	ACM 40408
JACOB I. CHRISTENSEN, USAF,)	
<i>Appellant.</i>)	Panel No. 2
)	

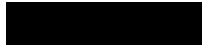
**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

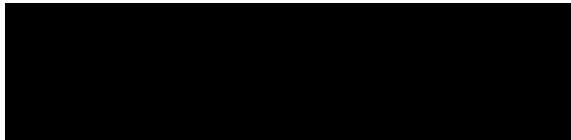


MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
United States Air Force



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 23 June 2023.



MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
United States Air Force

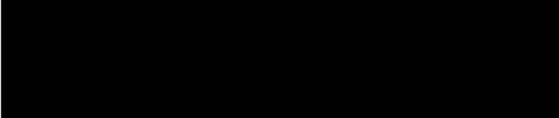



at 2-3. On 14 November 2022, the military judge sentenced Appellant to be reduced to the grade of E-4 and confined as follows, with all terms of confinement to run consecutively: 14 days for Charge I and its Specification; 90 days for Specification 1 of Charge II; 30 days for Specification 3 of Charge II; 90 days for Specification 6 of Charge II; and 60 days for Specification 7 of Charge II. R. at 394. The convening authority took no action on the findings and approved the sentence in its entirety. ROT, Vol. 1, Convening Authority Decision on Action, undated. The record of trial consists of 4 prosecution exhibits, 14 defense exhibits, 3 court exhibits, and 31 appellate exhibits. Appellant is not confined.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete her review of Appellant's case. This enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,


SAMANTHA P. GOLSETH, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division


CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Appellate Government Division on 22 August 2023.



SAMANTHA P. GOLSETH, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



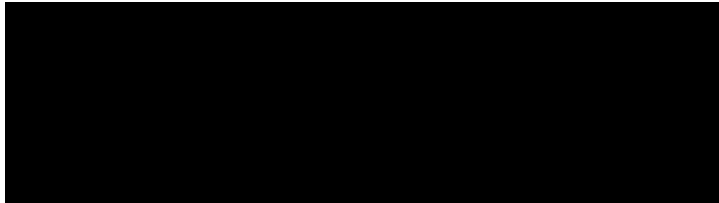
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Master Sergeant (E-7))	ACM 40408
JACOB I. CHRISTENSEN, USAF,)	
<i>Appellant.</i>)	Panel No. 2
)	

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

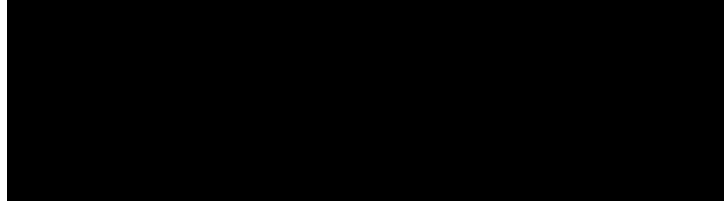


PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 23 August 2023.



PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES, <i>Appellee,</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME (THIRD)
)	
v.)	Before Panel No. 2
)	
Master Sergeant (E-7))	
JACOB I. CHRISTENSEN,)	No. ACM 40408
United States Air Force,)	
<i>Appellant.</i>)	19 September 2023

**TO THE HONORABLE, THE JUDGES OF THE UNITED STATES
AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) and (4) of this Honorable Court’s Rules of Practice and Procedure, Master Sergeant Jacob I. Christensen, Appellant, hereby moves for a third enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **28 October 2023**. The record of trial was docketed with this Court on 1 May 2023. From the date of docketing to the present date, 141 days have elapsed. On the date requested, 180 days will have elapsed.

Appellant was tried at a general court-martial before a military judge alone at Mountain Home Air Force Base, Idaho. Record of Trial (ROT), Vol. 1, Entry of Judgment (EOJ) at 1; R. at 1, 219. On 14 November 2022, consistent with Appellant’s pleas, the military judge found Appellant guilty of Charge I and its Specification; Specification 1 of Charge II; Specification 3 of Charge II, except the words and figures, “1 January 2016” and except the words, “on the stomach with a water bottle,” substituting therefore the words, “on her body with his hand”; Specification 6 of Charge II; Specification 7 of Charge II, except the words “by the neck”; and Charge II. R. at 307. Specification 2, 4, and 5 of Charge II were “withdrawn and dismissed without prejudice but to ripen into prejudice upon completion of any post-trial and appellate review.” ROT, Vol. 1, EOJ

at 2-3. On 14 November 2022, the military judge sentenced Appellant to be reduced to the grade of E-4 and confined as follows, with all terms of confinement to run consecutively: 14 days for Charge I and its Specification; 90 days for Specification 1 of Charge II; 30 days for Specification 3 of Charge II; 90 days for Specification 6 of Charge II; and 60 days for Specification 7 of Charge II. R. at 394. The convening authority took no action on the findings and approved the sentence in its entirety. ROT, Vol. 1, Convening Authority Decision on Action, undated. The record of trial consists of 4 prosecution exhibits, 14 defense exhibits, 3 court exhibits, and 31 appellate exhibits. Appellant is not confined.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete her review of Appellant's case. Appellant was informed of his right to a timely appeal and this request for an enlargement of time, and agrees with this request for an enlargement of time. This enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Appellate Government Division on 19 September 2023.



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



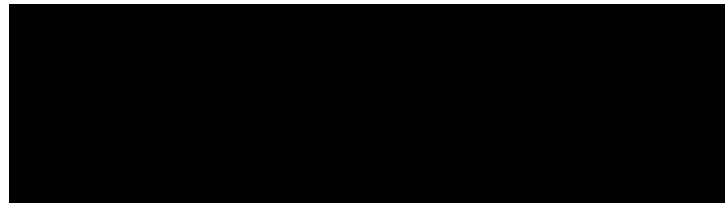
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Master Sergeant (E-7))	ACM 40408
JACOB I. CHRISTENSEN, USAF,)	
<i>Appellant.</i>)	Panel No. 2
)	

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

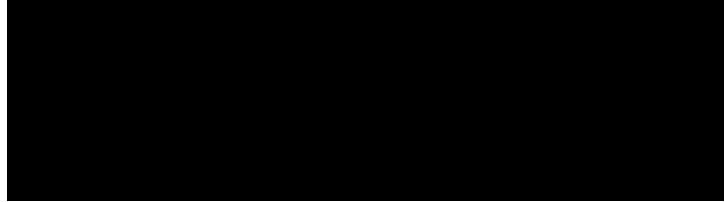


PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 20 September 2023.



PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



Appellant to be reduced to the grade of E-4 and confined as follows, with all terms of confinement to run consecutively: 14 days for Charge I and its Specification; 90 days for Specification 1 of Charge II; 30 days for Specification 3 of Charge II; 90 days for Specification 6 of Charge II; and 60 days for Specification 7 of Charge II. R. at 394. The convening authority took no action on the findings and approved the sentence in its entirety. Convening Authority Decision on Action. The record of trial consists of 4 prosecution exhibits, 14 defense exhibits, 3 court exhibits, and 31 appellate exhibits. Appellant is not confined.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete her review of Appellant's case. Appellant was informed of his right to a timely appeal and this request for an enlargement of time, and agrees with this request for an enlargement of time. This enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors.

Pursuant to A.F. CT. CRIM. APP. R. 23.3(m)(6), undersigned counsel also provides the following information: undersigned counsel currently represents 26 clients and is presently assigned 15 cases pending brief before this Court. Six cases pending before this Court currently have priority over the present case:

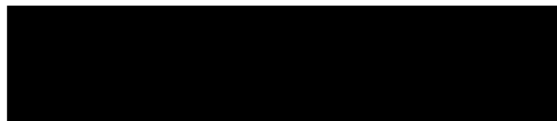
1. *United States v. Stanford*, No. ACM 40327 – The record of trial consists of 29 prosecution exhibits, 13 defense exhibits, and 59 appellate exhibits. The transcript is 753 pages. Appellant is not confined. Undersigned counsel has reviewed the entire record and is currently completing her draft of Appellant's assignments of error.
2. *United States v. Kight*, No. ACM 40337 – The record of trial consists of 6 prosecution exhibits, 5 defense exhibits, 1 court exhibit, and 36 appellate exhibits. The transcript is 1068 pages. Appellant is confined. Lead civilian appellate defense counsel, Mr. Scott

Hockenberry, has begun drafting Appellant's assignments of error and undersigned counsel will begin her review as soon as possible.

3. *United States v. Donley*, No. ACM 40350 – The record of trial consists of 7 prosecution exhibits, 4 defense exhibits, 1 court exhibit, and 66 appellate exhibits. The transcript is 1233 pages. Appellant is confined.
4. *United States v. George*, No. ACM 40397 – The record of trial consists of 3 prosecution exhibits, 12 defense exhibits, 1 court exhibit, and 22 appellate exhibits. The transcript is 779 pages. Appellant is not confined.
5. *United States v. Goodwater*, No. ACM 40304 (f rev) – The record of trial consists of 18 prosecution exhibits, 5 defense exhibits, and 26 appellate exhibits. The transcript is 413 pages. Appellant is confined.
6. *United States v. Johnson*, No. ACM 40291 (f rev) – The record of trial consists of 23 appellate exhibits, 28 prosecution exhibits, and 4 defense exhibits. The transcript is 395 pages. Appellant is not confined.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Appellate Government Division on 20 October 2023.



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



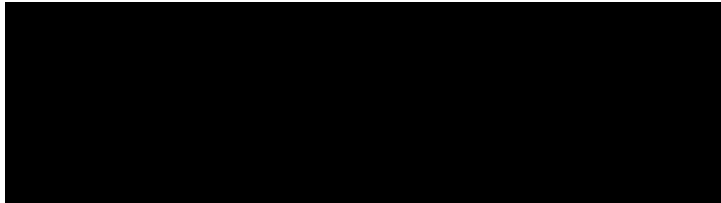
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Master Sergeant (E-7))	ACM 40408
JACOB I. CHRISTENSEN, USAF,)	
<i>Appellant.</i>)	Panel No. 2
)	

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

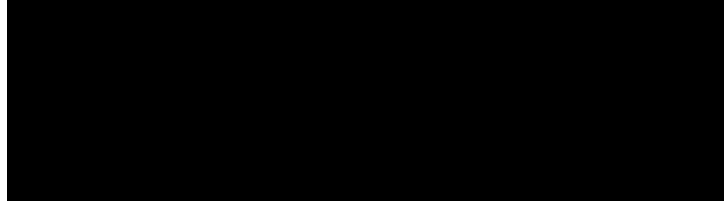


PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 24 October 2023.



PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



Appellant to be reduced to the grade of E-4 and confined as follows, with all terms of confinement to run consecutively: 14 days for Charge I and its Specification; 90 days for Specification 1 of Charge II; 30 days for Specification 3 of Charge II; 90 days for Specification 6 of Charge II; and 60 days for Specification 7 of Charge II. R. at 394. The convening authority took no action on the findings and approved the sentence in its entirety. Convening Authority Decision on Action. The record of trial consists of 4 prosecution exhibits, 14 defense exhibits, 3 court exhibits, and 31 appellate exhibits. Appellant is not confined.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete her review of Appellant's case. Appellant was informed of his right to a timely appeal and this request for an enlargement of time, and agrees with this request for an enlargement of time. This enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors.

Pursuant to A.F. CT. CRIM. APP. R. 23.3(m)(6), undersigned counsel also provides the following information: undersigned counsel currently represents 27 clients and is presently assigned 13 cases pending brief before this Court. Three cases pending before this Court currently have priority over the present case:

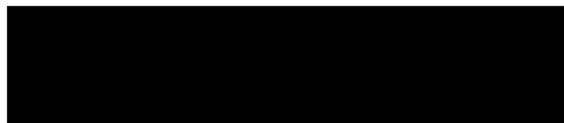
1. *United States v. Kight*, No. ACM 40337 – The record of trial consists of 6 prosecution exhibits, 5 defense exhibits, 1 court exhibit, and 36 appellate exhibits. The transcript is 1068 pages. Appellant is confined. Undersigned counsel has completed her review and is discussing potential issues for drafting with lead civilian appellate defense counsel, Mr. Scott Hockenberry.
2. *United States v. Donley*, No. ACM 40350 – The record of trial consists of 7 prosecution exhibits, 4 defense exhibits, 1 court exhibit, and 66 appellate exhibits. The transcript is

1233 pages. Appellant is confined. Undersigned counsel will complete her review as soon as possible.

3. *United States v. George Jr.*, No. ACM 40397 – The record of trial consists of 3 prosecution exhibits, 12 defense exhibits, 1 court exhibit, and 22 appellate exhibits. The transcript is 779 pages. Appellant is not confined.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Appellate Government Division on 20 November 2023.



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



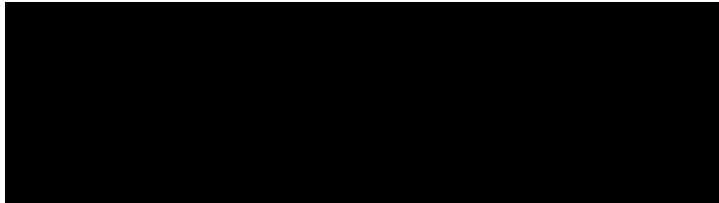
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Master Sergeant (E-7))	ACM 40408
JACOB I. CHRISTENSEN, USAF,)	
<i>Appellant.</i>)	Panel No. 2
)	

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

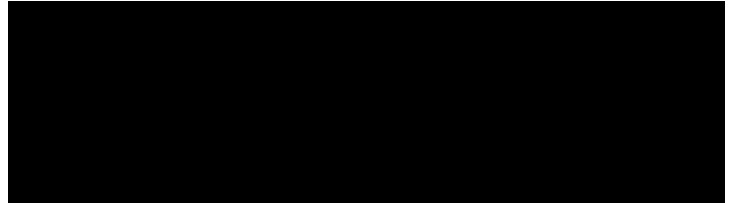


PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



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Appellate Defense Division on 22 November 2023.



PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES, <i>Appellee,</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME (SIXTH)
)	
v.)	Before Panel No. 2
)	
Master Sergeant (E-7))	
JACOB I. CHRISTENSEN,)	No. ACM 40408
United States Air Force,)	
<i>Appellant.</i>)	18 December 2023

**TO THE HONORABLE, THE JUDGES OF THE UNITED STATES
AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) and (6) of this Honorable Court’s Rules of Practice and Procedure, Master Sergeant Jacob I. Christensen, Appellant, hereby moves for a sixth enlargement of time to file Assignments of Error. Appellant requests an enlargement for a period of 30 days, which will end on **26 January 2024**. The record of trial was docketed with this Court on 1 May 2023. From the date of docketing to the present date, 231 days have elapsed. On the date requested, 270 days will have elapsed.

Appellant was tried at a general court-martial before a military judge alone at Mountain Home Air Force Base, Idaho. R. at 1, 219. On 14 November 2022, consistent with Appellant’s pleas, the military judge found Appellant guilty of Charge I and its Specification; Specification 1 of Charge II; Specification 3 of Charge II, except the words and figures, “1 January 2016” and except the words, “on the stomach with a water bottle,” substituting therefore the words, “on her body with his hand”; Specification 6 of Charge II; Specification 7 of Charge II, except the words “by the neck”; and Charge II. R. at 307. Specification 2, 4, and 5 of Charge II were “withdrawn and dismissed without prejudice but to ripen into prejudice upon completion of any post-trial and appellate review.” Entry of Judgment at 2-3. On 14 November 2022, the military judge sentenced

Appellant to be reduced to the grade of E-4 and confined as follows, with all terms of confinement to run consecutively: 14 days for Charge I and its Specification; 90 days for Specification 1 of Charge II; 30 days for Specification 3 of Charge II; 90 days for Specification 6 of Charge II; and 60 days for Specification 7 of Charge II. R. at 394. The convening authority took no action on the findings and approved the sentence in its entirety. Convening Authority Decision on Action. The record of trial consists of 4 prosecution exhibits, 14 defense exhibits, 3 court exhibits, and 31 appellate exhibits. Appellant is not confined.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete her review of Appellant's case. Appellant was informed of his right to a timely appeal and this request for an enlargement of time, and agrees with this request for an enlargement of time. This enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors. During the fifth enlargement of time, undersigned counsel prepared for and participated in six moot arguments, prepared for and gave two moot arguments, and argued before the Court of Appeals for the Armed Forces in *United States v. Cole*, USCA Dkt. No. 23-0162/AF, No. ACM 40189. She also drafted assignments of error in *United States v. Kight*, No. ACM 40337. Undersigned counsel is currently on leave out of the local area where her mother is currently hospitalized; she is expecting to return on 25 December 2023.

Pursuant to A.F. CT. CRIM. APP. R. 23.3(m)(6), undersigned counsel also provides the following information: undersigned counsel currently represents 27 clients and is presently assigned 13 cases pending brief before this Court. Three cases pending before this Court currently have priority over the present case:

1. *United States v. Kight*, No. ACM 40337 – The record of trial consists of 6 prosecution exhibits, 5 defense exhibits, 1 court exhibit, and 36 appellate exhibits. The transcript is 1068 pages. The appellant is confined. Undersigned counsel is finalizing the appellant’s brief for filing no later than 8 January 2024.
2. *United States v. Donley*, No. ACM 40350 – The record of trial consists of 7 prosecution exhibits, 4 defense exhibits, 1 court exhibit, and 66 appellate exhibits. The transcript is 1233 pages. The appellant is confined. Undersigned counsel is reviewing the record, has reviewed portions of the sealed materials, and has identified assignments of error. She has requested one final enlargement of time to complete the appellant’s assignments of error.
3. *United States v. George Jr.*, No. ACM 40397 – The record of trial consists of 3 prosecution exhibits, 12 defense exhibits, 1 court exhibit, and 22 appellate exhibits. The transcript is 779 pages. The appellant is not confined.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Appellate Government Division on 18 December 2023.



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



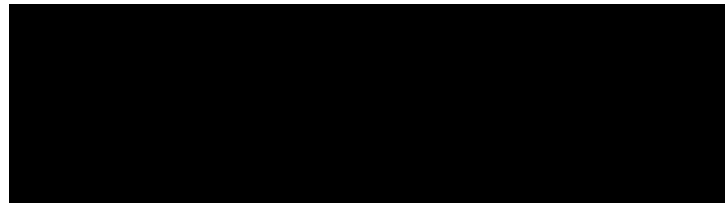
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UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
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Master Sergeant (E-7))	ACM 40408
JACOB I. CHRISTENSEN, USAF,)	
<i>Appellant.</i>)	Panel No. 2
)	

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

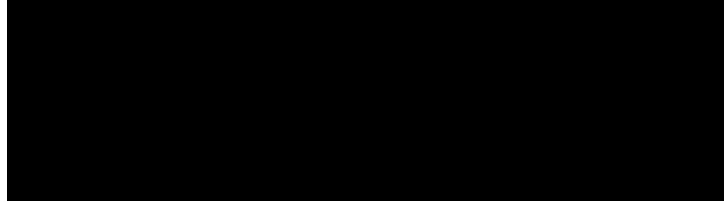


PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 20 September 2023.



PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



Appellant to be reduced to the grade of E-4 and confined as follows, with all terms of confinement to run consecutively: 14 days for Charge I and its Specification; 90 days for Specification 1 of Charge II; 30 days for Specification 3 of Charge II; 90 days for Specification 6 of Charge II; and 60 days for Specification 7 of Charge II. R. at 394. The convening authority took no action on the findings and approved the sentence in its entirety. Convening Authority Decision on Action. The record of trial consists of 4 prosecution exhibits, 14 defense exhibits, 3 court exhibits, and 31 appellate exhibits. Appellant is not confined.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete her review of Appellant's case. Appellant was informed of his right to a timely appeal and this request for an enlargement of time, and agrees with this request for an enlargement of time. This enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors. During the sixth enlargement of time, undersigned counsel prepared for and participated in four moot arguments; drafted assignments of error in *United States v. Donley*, No. ACM 40350 (a case which involved 7 prosecution exhibits, 4 defense exhibits, 1 court exhibit, and 66 appellate exhibits, and 1233 transcript pages) which will be filed on 22 January 2024; and researched, assisted in drafting, and edited the Petitioner's Reply Brief before the U.S. Supreme Court in *Martinez et. al. v. United States*, No. 23-242, filed 9 January 2024.

Pursuant to A.F. CT. CRIM. APP. R. 23.3(m)(6), undersigned counsel also provides the following information: undersigned counsel currently represents 34 clients and is presently assigned 15 cases pending brief before this Court. One case pending before this Court currently has priority over the present case:

1. *United States v. George Jr.*, No. ACM 40397 – The record of trial consists of 3 prosecution exhibits, 12 defense exhibits, 1 court exhibit, and 22 appellate exhibits. The transcript is 779 pages. The appellant is not confined and undersigned counsel is currently reviewing the record.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Appellate Government Division on 19 January 2024.



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' OPPOSITION
<i>Appellee,</i>)	TO APPELLANT'S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	
Master Sergeant (E-7))	ACM 40408
JACOB I. CHRISTENSEN, USAF,)	
<i>Appellant.</i>)	Panel No. 2
)	

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

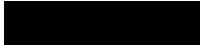
Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant's Motion for Enlargement of Time.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant nearly a year to submit an assignment of error to this Court. If Appellant's new delay request is granted, the defense delay in this case will be 300 days in length. Appellant's nearly year-long delay practically ensures this Court will not be able to issue a decision that complies with our superior Court's appellate processing standards. Appellant has already consumed almost two-thirds of the 18-month standard for this Court to issue a decision, which only leaves about 8 months combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant's counsel has not completed review of the record of trial at this late stage of the appellate process.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

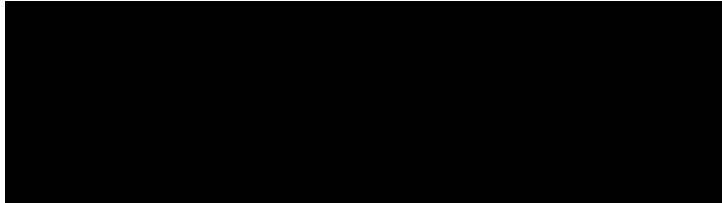


PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force

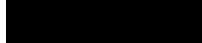


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 23 January 2024.



PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



**UNITED STATES AIR FORCE
COURT OF CRIMINAL APPEALS**

UNITED STATES)	No. ACM 40408
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Jacob I. CHRISTENSEN)	
Master Sergeant (E-7))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 2

On 19 January 2024, counsel for Appellant submitted a Motion for Enlargement of Time (Seventh) requesting an additional 30 days to submit Appellant's assignments of error. The Government opposes the motion.

The court has considered Appellant's motion, the Government's opposition, case law, and this court's Rules of Practice and Procedure. Accordingly, it is by the court on this 24th day of January, 2024,

ORDERED:

Appellant's Motion for Enlargement of Time (Seventh) is **GRANTED**. Appellant shall file any assignments of error not later than **25 February 2024**.

Appellant's counsel is advised that given the number of enlargements granted thus far, the court will continue to closely examine any further requests for an enlargement of time.



FOR THE COURT



FLEMING E. KEEFE, Capt, USAF
Deputy Clerk of the Court

MSgt Christensen to be reduced to the grade of E-4 and confined as follows, with all terms of confinement to run consecutively: 14 days for Charge I and its Specification; 90 days for Specification 1 of Charge II; 30 days for Specification 3 of Charge II; 90 days for Specification 6 of Charge II; and 60 days for Specification 7 of Charge II. R. at 394. The convening authority took no action on the findings and approved the sentence in its entirety. Convening Authority Decision on Action. The record of trial consists of 4 prosecution exhibits, 14 defense exhibits, 3 court exhibits, and 31 appellate exhibits. Appellant is not confined.

Through no fault of MSgt Christensen, undersigned counsel has been working on other assigned matters and though she is reviewing his case and has identified potential assignments of error, she has not yet finished her review. MSgt Christensen was informed of his right to a timely appeal and this request for an enlargement of time, and agrees with this request for an enlargement of time. This enlargement of time is necessary to allow undersigned counsel to fully review his case and advise him regarding potential errors.

During the seventh enlargement of time, undersigned counsel filed six assignments of error in *United States v. Donley*, No. ACM 40350; reviewed *United States v. George Jr.*, No. ACM 40397, (detailed further below) and is currently drafting assignments of error for that case which will be filed on or before 27 February 2024; prepared for and participated in three moot arguments; and attended arguments before the Court of Appeals for the Armed Forces (CAAF) on 7 February 2024.

During the requested enlargement of time, in addition to filing the appellant's brief in *United States v. George Jr.*, No. ACM 40397, and further reviewing the MSgt Christensen's record of trial, undersigned counsel anticipates needing to draft reply briefs in *United States v. Donley*, No. ACM 40350 and *United States v. Kight*, No. ACM 40337; the Government's respective answers are due on 21 February 2024 and 22 February 2024. Additionally, undersigned counsel will be preparing

for and participating in three moot arguments between 23 February 2024 and 4 March 2024, and will attend the CAAF argument on 6 March 2024.

Pursuant to A.F. CT. CRIM. APP. R. 23.3(m)(6), undersigned counsel also provides the following information: undersigned counsel currently represents 35 clients and is presently assigned 17 cases pending brief before this Court. One case pending before this Court currently has priority over the present case:

1. *United States v. George Jr.*, No. ACM 40397 – The record of trial consists of 3 prosecution exhibits, 12 defense exhibits, 1 court exhibit, and 22 appellate exhibits. The transcript is 779 pages. The appellant is not confined and undersigned counsel is currently drafting assignments of error which will be filed on or before 27 February 2024.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Appellate Government Division on 15 February 2024.



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

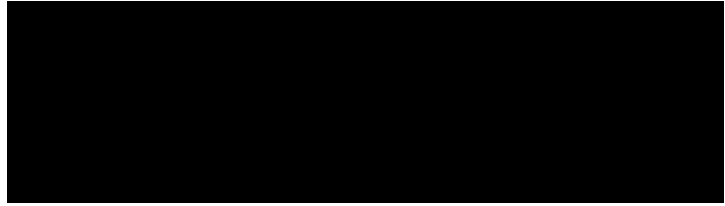
UNITED STATES,)	UNITED STATES' OPPOSITION
<i>Appellee,</i>)	TO APPELLANT'S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	
Master Sergeant (E-7))	ACM 40408
JACOB I. CHRISTENSEN, USAF,)	
<i>Appellant.</i>)	Panel No. 2
)	

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant's Motion for Enlargement of Time.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant nearly a year to submit an assignment of error to this Court. If Appellant's new delay request is granted, the defense delay in this case will be 330 days in length. Appellant's nearly year-long delay practically ensures this Court will not be able to issue a decision that complies with our superior Court's appellate processing standards. Appellant has already consumed almost two-thirds of the 18-month standard for this Court to issue a decision, which only leaves about 7 months combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant's counsel has not completed review of the record of trial at this late stage of the appellate process.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

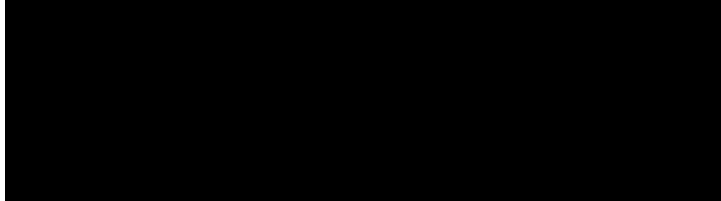


PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 20 February 2024.



PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,
Appellee,

v.

Master Sergeant (E-7)
JACOB I. CHRISTENSEN,
United States Air Force,
Appellant.

**MOTION TO WITHDRAW FROM
APPELLATE REVIEW AND ATTACH**

Before Panel No. 2

No. ACM 40408

21 March 2024

**TO THE HONORABLE, THE JUDGES OF THE UNITED STATES
AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 16 and 23.3(i) of this Honorable Court’s Rules of Practice and Procedure, and Rule for Courts-Martial (R.C.M.) 1115, Master Sergeant (MSgt) Jacob I. Christensen, Appellant, moves to withdraw his case from appellate review. Undersigned counsel withdraws the previously filed Motion to Withdraw from Appellate Review and Attach, filed on 21 March 2024, because undersigned counsel had not circled or lined through the words “(waive)(withdraw)” to confirm MSgt Christensen’s election on page two of the two-page document that MSgt Christensen sought to attach. In the two-page document that MSgt Christensen now seeks to attach, undersigned counsel has lined through the word “waive” and has circled the word “withdraw” to confirm MSgt Christensen’s election.

MSgt Christensen has fully consulted with Major Samantha P. Golseth, his appellate defense counsel, regarding this motion to withdraw. No person has compelled, coerced, or induced Appellant by force, promises of clemency, or otherwise, to withdraw his case from appellate review. Further, pursuant to Rules 16.1, 23(b), and 23.3(b) of this Honorable Court’s Rules of Practice and Procedure, undersigned counsel asks this Honorable Court to attach the two-page

document appended to this pleading to the record of this proceeding. The appended document is necessary to comply with R.C.M. 1115(d) and R.C.M. 1115(e).

WHEREFORE, MSgt Christensen respectfully requests this Honorable Court grant this motion to withdraw from appellate review, and to grant this request to attach matters to the record.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Samantha P. Golseth.

SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

A large black rectangular redaction box covering contact information, including a phone number and address.

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 21 March 2024.



SAMANTHA P. GOLSETH, Maj, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

