

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA :
 :
 v. : **Criminal No. 21-cr-445 (CKK)**
 :
 ANDREW ALAN HERNANDEZ, :
 :
 Defendant. :

**CONSENT MOTION FOR ADDITIONAL TIME TO FILE GOVERNMENT'S
MEMORANDUM IN AID OF SENTENCING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully moves the Court for additional time to file the government's memorandum in aid of sentencing. In support of said motion, the government states as follows:

1. Pursuant to the Court's September 22, 2022 Order, the government's memorandum in aid of sentencing is due today, on January 9, 2023; the defendant's memorandum in aid of sentencing is due on January 17, 2023, and the sentencing hearing is scheduled for January 27, 2023 at 10:00 a.m.
2. Government counsel's mother has been hospitalized on and off since December 25, 2022, and was released on January 9, 2023. As a result, government counsel needs additional time to complete and file its memorandum in aid of sentencing and requests additional time up until January 13, 2023, to file its memorandum.
3. On or about January 9, 2023, government counsel contacted defense counsel and the defendant consents to the government's motion.

WHEREFORE, the government respectfully requests that the Court grant the instant motion.

Respectfully submitted,

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