IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, :

:

v. : No. 22-cr-0016-CJN

:

BRYAN BUSTOS, :

Defendant. :

MOTION FOR LEAVE TO LATE FILE DEFENDANT'S SENTENCING MEMORANDUM

COMES NOW, Allen H. Orenberg, counsel for Bryan Bustos, to respectfully request the entry of an Order permitting leave to late file the defendant's sentencing memorandum. As grounds, the following is stated:

- 1. Sentencing is scheduled for February 15, 2023, at 12:30 p.m. (VTC)
- 2. The Court previously instructed the parties to file sentencing memorandums on or before February 10, 2023.
- 3. Undersigned counsel finalized the defendant's sentencing memorandum during the evening of February 10, 2023. However counsel was unable to file the document because CM/ECF was "off-line" for an upgrade from 6:00 p.m. on February 10, 2023, through 9:00 a.m on February 13, 2023.

Wherefore, for the foregoing reasons and such other reasons that appear just and proper, Allen H. Orenberg, counsel for Bryan Bustos, respectfully requests the entry of an Order permitting leave to late file the defendant's sentencing memorandum.

Respectfully Submitted,

Allen H. Orenberg, # 395519
The Orenberg Law Firm, P.C.
12505 Park Potomac Avenue, 6th Floor
Potomac, Maryland 20854
Tel. No. 301-984-8005
Cell Phone No. 301-807-3847
Fax No. 301-984-8008
aorenberg@orenberglaw.com

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of February, 2023, a copy of the foregoing Motion for Leave to Late File Defendant's Sentencing Memorandum, and a proposed Order, was delivered to case registered parties by the CM/ECF court system.

Allen H. Orenberg

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