

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

**UNITED STATES OF AMERICA** :  
 :  
 v. : **CRIMINAL NO. 21-CR-48 (ABJ)**  
 :  
 **DENNIS SIDORSKI,** :  
 **Defendant.** :

**JOINT MOTION FOR EXTENSION OF TIME  
TO FILE SUPPLEMENTAL BRIEFING**

The United States of America, by and through the United States Attorney for the District of Columbia, respectfully submits this joint motion for an extension of time within which to file supplemental briefing to the parties' sentencing memoranda. The parties' supplemental briefs are currently due on Friday, June 3, 2022. The parties request a one-week extension of time for the filing of those briefs until Friday, June 10, 2022. The parties offer the following suggestions in support of this motion:

1. On Thursday, May 12, 2022, the Court requested a conference call regarding supplemental issues prior to the sentencing of the defendant. *See* ECF Minute Entry dated May 12, 2022. During that call, the Court requested supplemental briefing from the parties in the following areas:

- a. Whether other courts had been using a United States Sentencing Guideline (USSG) base offense level of 10 for 18 U.S.C. § 1752(a) offenses, under USSG § 2A2.4, or whether base offense level 4, under USSG § 2B2.3, had been used;
- b. Whether the determination to use USSG § 2A2.4 for the defendant was premised on, completely or in part, the fact the defendant made physical contact with a law enforcement officer outside of the Capitol;
  - i. If so, whether the three-level enhancement for physical contact, under USSG § 2A2.4(b)(1)(A), would be considered double counting for purposes of calculating total offense level; and
- c. Generally, for comparative purposes, what was the conduct of other 18 U.S.C. § 1752(a) defendants.

2. Due to the legal and factual issues raised in the Court's request for supplemental briefing, additional time is required for research in order to complete a thorough and thoughtful response.

3. The defendant's sentencing hearing is scheduled for June 15, 2022, at 2:00pm EST, and this request for an extension would not change that date.

4. The government and counsel for the defendant have conferred and are in agreement regarding the necessity of this motion.

WHEREFORE, the parties pray this Court grant an extension of time up to and including June 10, 2022, in which to file their supplemental briefs.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the Joint Motion for Extension of Time was served upon counsel of record through ECF on the date of filing.

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