

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	Criminal No. 1:21-cr-00271-EGS-2
v.	:	
	:	
DIANA SANTOS-SMITH	:	Honorable Emmet G. Sullivan

**DEFENDANT’S MOTION FOR ADDITIONAL TIME WITHIN WHICH TO FILE
SENTENCING MEMORANDUM**

COMES NOW, Defendant Diana Santos-Smith, by and through her legal counsel, Robert E. Goldman, Esquire, and respectfully requests an extension of time within which to file her Sentencing Memorandum, and in support thereof avers as follows:

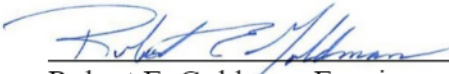
1. Defendant’s Sentencing Memorandum is due to be filed on or before March 3, 2022.
2. Defendant’s counsel is a solo practitioner and is currently attached to begin a four-week federal kidnapping/homicide jury trial on March 14, 2022, in *United States v. John Perkins*, Criminal No. 2:19-cr-000269-MSG-7 (United States District Court for the EDPA), before the Honorable Mitchell S. Goldberg, and counsel’s time has been consumed by trial preparation.
3. An enlargement of time, of one (1) additional day, to file the Sentencing Memorandum will allow Defendant’s counsel to adequately meet the legal needs of his client.
4. The ends of justice will be properly served if Defendant’s request an extension of time of one (1) day, that is, until March 4, 2022, to file Defendant’s Sentencing Memorandum, is granted.
5. Counsel for the Government has no objection to this request.

WHEREFORE, the Defendant respectfully requests this Honorable Court grant this request and provide the Defendant one (1) day extension, that is, until March 4, 2022, within which to file Defendant's Sentencing Memorandum.

Dated: March 3, 2022

Respectfully Submitted:

By:


Robert E. Goldman, Esquire

535 Hamilton Street, Suite 302

Allentown, PA 18101

(610) 841-3876

reg@bobgoldmanlaw.com

Counsel for Defendant Diana Santos-Smith

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA


UNITED STATES OF AMERICA :
 :
 v. : Criminal No. 1:21-cr-00271-EGS-2
 :
 :
 DIANA SANTOS-SMITH : Honorable Emmet G. Sullivan

CERTIFICATE OF SERVICE

I, Robert E. Goldman, Esquire, do hereby certify that a true and correct copy of the foregoing *Defendant’s Motion for Additional Time Within Which to File Sentencing Memorandum* and *proposed Order* were served upon the following individual(s) in the manner and at the address(es) indicated below:

Via ECF
AUSA Sean P. Murphy
United States Attorney’s Office
Torre Chardón, Suite 1201
350 Carlos Chardón Street
San Juan, PR 00918
Sean.Murphy@usdoj.gov

Dated: March 3, 2022

By: 
Robert E. Goldman, Esquire
PA I.D. # 25340
535 Hamilton Street, Suite 302
Allentown, PA 18101
(610) 841-3876
reg@bobgoldmanlaw.com
Counsel for Defendant Diana Santos-Smith