

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

UNITED STATES OF AMERICA	:	
	:	Case No. 1:21-cr-00161 (RBW)
v.	:	
	:	
DUSTIN THOMPSON,	:	
	:	
Defendant.	:	

**GOVERNMENT’S MOTION FOR LEAVE TO FILE RESPONSE TO DEFENDANT’S
SENTENCING MEMORANDUM**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully moves for leave to file a response to the defendant Dustin Thompson’s sentencing memorandum. Under Local Criminal Rule 32.2(f), if the Court allows a new objection to a PSR after the final PSR is prepared, it “shall ensure that the . . . other party has ample notice of the objection and an opportunity fairly to rebut . . . the assertion.” LCrR 32.2(f). Thompson filed his sentencing memorandum four days ago. *See* Dkt. 145. In that memorandum, Thompson raises two new guidelines objections that he failed to raise in response to the draft pre-sentence report (PSR). *Compare* Dkt. 145 at 1 (objecting to the 8-level and 3-level enhancement under 2J1.2), *with* Dkt. 113 at 35-36 (summarizing the defendant’s objections to the draft pre-sentence report, which did not include objections to either enhancement). He also added significant new arguments, relative to his PSR objections, in support of his objections to the application of a 2-level enhancement for perjury and his claim that he is entitled to a 2-level reduction for acceptance of responsibility. *Compare* Dkt. 145 at 10-17, *with* Dkt. 113 at 35. The government seeks leave to file a response only to this new information. Its response is attached to this motion.

Therefore, the government moves this Court for leave to file the attached Government's Response to the Defendant's Sentencing Memorandum.

Respectfully submitted,

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