

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)
)
 v.) USDC No. 22-cr-381-02 (JEB)
 Jacob Michael Therres,, *defendant.*)

UNOPPOSED MOTION TO EXTEND TIME FOR SELF-SURRENDER

Defendant, through undersigned counsel Nathan I. Silver, II, Esq. (“counsel”), appointed by this Court under the Criminal Justice Act, with no opposition from the United States, respectfully moves the Court to extend the date by thirty (30) days, or until July 26, 2023, on which the defendant must self-surrender.

The Court has ordered that the defendant must surrender to the U.S. Bureau of Prisons no earlier than June 26, 2023. The defendant has been offered employment on a short-term project by a contractor who seeks the defendant's help in framing a house. The job should last about thirty days. A letter from the contractor, Luis Cuoto, is attached. Being able to work on this project will provide needed funds to the defendant’s fiancée, Katilyn Payne, and the couple’s newborn son, before the defendant begins serving his sentence.

The government does not oppose this motion.

A proposed Order is attached.

WHEREFORE, the defendant respectfully moves the Court to grant said relief.

This pleading is,

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Andrew J. Tessman, Esq., DOJ-USAO (W. VA), attorney of record for the United States, this 12th day of June, 2023.

/s/

Nathan I. Silver, II