

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : Case No. 21-Cr.- 73- (BAH)  
v. :  
NICHOLAS DECARLO :  
and :  
NICHOLAS OCHS :  
Defendants. :

**DEFENDANTS' UNOPPOSED MOTION FOR ADDITIONAL  
TIME TO FILE SENTENCING MEMORANDUM**

Defendant Nicholas DeCarlo respectfully moves this Court for two additional days – until Wednesday, November 30, 2022 - in which to file the Sentencing Memorandum in this case. Undersigned has communicated with the prosecutor assigned to this matter, who does not object to the additional time, but requests that the date for filing the Government's reply sentencing memorandum be extended until Friday, December 2, 2022. Undersigned has also communicated with counsel for co-defendant Nicholas Ochs, who would also file his sentencing memorandum on November 30, 2022. Undersigned counsel for Mr. DeCarlo has been working diligently on the Sentencing Memorandum, but drafting the pleading required an extensive review of the dockets of a significant number of the other cases involving the events of January 6, 2022. Counsel also wishes to ensure that his client has sufficient time to review the Sentencing Memorandum before it is filed. Counsel will endeavor to use the additional time to file a more concise pleading for the Court's review.

An appropriate draft Order is attached hereto for the Court's review.

Respectfully submitted,

*Robert Feitel*

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent via ECF to Assistant United States Attorney (detailee) Alexis Loeb, and to counsel for co-defendant Nicholas Ochs, this 28th day of November, 2022.

*Robert Feitel*

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Robert Feitel