

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
 v.)
)
 DANIEL GOODWYN,)
)
 Defendant.)

Case No. 1:21-cr-00153 (RBW)

DEFENDANT'S MOTION FOR LEAVE OF COURT TO EXTEND TIME TO FILE

Comes now the Defendant, Daniel Goodwyn by and through undersigned counsel, and respectfully moves this court to extend his time for filing the Sentencing Memorandum by one hour for good cause and as determined, excusable neglect. The following supports this request:

After a month of drought, the undersigned's section of Florida received a lengthy torrential downpour. The redundant internet for the rural law office, comprised of landline, 5G cell extension, and satellite internet service were disrupted for hours, making cloud files of the support letters unavailable. Counsel has proceeded as quickly as possible in finalizing the memorandum.

Wherefore, for good cause shown, or otherwise excusable neglect where the rain inundation disrupting rural internet was not predicted, the undersigned requests that this Court allow a one hour extension.

Dated May 22, 2023

Respectfully submitted,
/s/ Carolyn A. Stewart

Carolyn A. Stewart, Bar No. FL-0098
Defense Attorney
Stewart Country Law PA
1204 Swilley Rd.
Plant City, FL 33567
Tel: (813) 659-5178
E: Carolstewart_esq@protonmail.com

CERTIFICATE OF SERVICE

I hereby certify on the 22nd day of May 2023, a copy of the foregoing was served upon all parties as forwarded through the Electronic Case Filing (ECF) System.

/s/ Carolyn A. Stewart
Carolyn A. Stewart, Esq.