

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

KYLE FITZSIMONS

No. 1:21-cr-158 (RC)

**UNOPPOSED MOTION TO EXTEND TIME TO SUBMIT PSR OBJECTIONS**

The government respectfully requests that the deadline to submit objections to the presentence investigation report (PSR) be extended by one week, from January 20, 2023, to January 27, 2023. Counsel for the defendant does not oppose this request. The government is not seeking a continuance of the February 17, 2023, sentencing date.

The government seeks additional time to fully consider and address the guideline calculations in the PSR, including, among other things, the grouping analysis and its impact on the advisory guideline range. The extension is not being sought for purposes of delay, but rather to assure that justice is done.

**CONCLUSION**

For the foregoing reasons, the government respectfully requests that the deadline to respond to the PSR be extended by one week.

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*/s/ Douglas B. Brasher*  
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**Certificate of Conference**

I, the undersigned attorney for the government, certify that I conferred with Natasha Taylor-Smith, counsel for defendant Kyle Fitzsimons, by email on January 20, 2023. Ms. Taylor-Smith indicated that she is not opposed the requested one-week extension.

/s/ Douglas B. Brasher  
DOUGLAS B. BRASHER