

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

**UNITED STATES OF AMERICA**

v.

**BRADLEY RUKSTALES,**

*Defendant.*

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**Criminal No. 5:21-CR-41 (CJN)**

**MOTION FOR LEAVE TO LATE FILE  
GOVERNMENT’S SENTENCING MEMORANDUM**

The United States of America, by and through the Acting United States Attorney for the District of Columbia, respectfully moves this Court for leave to late file its sentencing memorandum in the above-captioned case. In support of this motion, the government now states the following:

1. On August 31, 2021, the Court set a sentencing date in this matter for November 12, 2021.
2. Undersigned counsel mistakenly believed that the Court had set a due date for filing sentencing memoranda on November 5, 2021, one week before the sentencing date. However, upon receiving the defense’s motion to late file its sentencing memorandum on November 4, 2021, and in reviewing the docket entries for this case, undersigned counsel realized that the Court set a filing deadline of November 3, 2021.
3. If the Court grants the government’s motion, the government’s motion will be filed less than nine hours after the Court’s deadline. Undersigned counsel submits that the defense is not prejudiced by this delay, just as the government has not been prejudiced by the defense’s delay in filing its motion.

WHEREFORE, for the foregoing reasons, the government respectfully requests that the Court GRANT its motion for leave to file the attached sentencing memorandum.

Respectfully submitted,

CHANNING D. PHILLIPS  
Acting United States Attorney  
D.C. Bar No. 415793

By: /s/ Seth Adam Meinero  
SETH ADAM MEINERO  
Trial Attorney  
Detailee  
United States Attorney's Office for the  
District of Columbia  
D.C. Bar No. 976587  
202-252-5847  
Seth.Meinero@usdoj.gov

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 4, 2021, I served a copy of this pleading on defendant's counsel through the Court's Electronic Case Files system.

/s/ Seth Adam Meinero  
SETH ADAM MEINERO  
Trial Attorney  
Detailee