

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

|                                  |   |                            |
|----------------------------------|---|----------------------------|
| <b>UNITED STATES OF AMERICA,</b> | ) | <b>CRIMINAL ACTION NO.</b> |
|                                  | ) |                            |
| <b>Plaintiff,</b>                | ) | <b>1:21-CR-00032-DLF</b>   |
|                                  | ) |                            |
| <b>v.</b>                        | ) |                            |
|                                  | ) |                            |
| <b>GUY WESLEY REFFITT,</b>       | ) |                            |
|                                  | ) |                            |
| <b>Defendant.</b>                | ) |                            |
| _____                            | ) |                            |

**MOTION TO EXTEND DATE ON WHICH TO FILE OBJECTIONS TO  
THE PRESENTENCE REPORT AND MOTION TO CONTINUE  
SENTENCING DATE**

Defendant, Guy Wesley Reffitt, hereby moves this court to extend the date by which he must file objections to the presentence report and moves to continue the sentencing date in this matter and, in support of this motion, sets forth the following facts and argument:

1. Undersigned counsel did not represent Mr. Reffitt at trial. He was not retained until on or about May 31, 2022, after donated funds became available.
2. Counsel needs sufficient time to review the trial transcripts in this case, travel to the District of Columbia to meet with Mr. Reffitt (who is incarcerated), and file proper objections to the Presentence Report (the PSR). Counsel also needs sufficient time to prepare a detailed sentencing memorandum and gather letters in support of Mr. Reffitt.

3. The PSR in this case is complicated in that it uses several cross references and one of the offenses of conviction does not appear in Appendix A of the United States Sentencing Guidelines Manual.

4. Undersigned Counsel has preplanned vacations with his children from July 9, 2022-July 22, 2022, and from August 7, 2022-August 11, 2022.

5. Counsel requests this Court to continue the sentencing date in this matter until on or after August 15, 2022.

6. Simply put, during the pendency of the continuance, Mr. Reffitt will remain incarcerated and the government will suffer no prejudice from an approximate 45-day continuance. Meanwhile, such a continuance will ensure that Mr. Reffitt receives effective assistance of counsel at sentencing. Finally, it is hoped that a continuance will allow counsel to present more focused PSR objections and a more focused sentencing presentation in general, thereby conserving judicial resources.

WHEREFORE, Guy Wesley Reffitt, respectfully requests this Court to extend the date by which he must file objections to the presentence report and moves to continue sentencing date in this matter until on or after August 15, 2022.<sup>1</sup>

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<sup>1</sup>The government has indicated that it would not oppose a continuance of the sentencing to the week of July 25, 2022. While counsel *is* available that date, as noted above, Undersigned Counsel has preplanned vacations with his children from July 9, 2022-July 22, 2022. This would make it difficult to make filings during the two-week period prior to sentencing. In counsel's experience, the two week period prior to sentencing normally produces several filings related to

Respectfully submitted,

/s/ F. Clinton Broden  
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Attorney for Defendant  
Guy Wesley Reffitt

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sentencing.

**CERTIFICATE OF SERVICE**

I, F. Clinton Broden, certify that on June 3, 2022, I caused a copy of the above document to be served via electronic filing on all counsel of record:

/s/ F. Clinton Broden  
F. Clinton Broden