

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal Action No. 21-22 (CKK)

CHRISTOPHER RAY GRIDER.

Defendant.

**DEFENDANT'S UNOPPOSED MOTION TO
EXTEND DEADLINE TO FILE SENTENCING MEMORADUM**

TO THE HONORABLE COLLEEN KOLLAR-KOTELLY, UNITED STATES DISTRICT COURT SENIOR JUDGE FOR THE DISTRICT OF COLUMBIA:

CHRISTOPHER RAY GRIDER, the Defendant in the above-styled and numbered cause, by and through undersigned counsel, moves this Court to extend the deadline to file his sentencing memorandum from Friday, May 5, 2023 to Monday, May 8, 2023. In support thereof, Mr. Grider would show the following.

1. Mr. Grider's sentencing hearing is scheduled for May 23, 2023. *See* Minute Entry of 12/21/22. This Court originally set April 7, 2023 as the due date for the Government's sentencing memorandum and April 28, 2023 as the due date for Mr. Grider's sentencing memorandum. *Id.* However, after the Government moved (without opposition) to extend their deadline from April 7, 2023 for one week to April 14, 2023, this Court granted that extension and also extended the deadline for Mr. Grider to file his sentencing memorandum to May 5, 2023. ECF Dkt. [169](#).

2. While undersigned counsel was anticipating filing Mr. Grider's sentencing memorandum by the presently scheduled deadline, on April 20, 2023, he was informed that he was proceeding to a jury trial in Texas state court on an intoxication manslaughter case, and indeed proceeded to trial on Monday, May 1, 2023. The jury is presently deliberating their verdict in that case.
3. In addition to this obligation, undersigned counsel learned yesterday that multiple individuals who had attempted to submit character reference letters on behalf of Mr. Grider were not received by undersigned counsel due possibly to spam filters or misspelled email addresses. In short, undersigned counsel believes he has 10 or more character reference letters to review and incorporate into Mr. Grider's sentencing memorandum.
4. Out of an abundance of caution, and to insure the effective representation of counsel to Mr. Grider, on behalf of Mr. Grider, in light of the preceding circumstance, undersigned counsel is requesting this Court to extend the deadline to submit Mr. Grider's sentencing memorandum from Friday, May 5, 2023 to Monday, May 8, 2023.
5. Undersigned counsel conferred with counsel for the Government, Francesco Valentini, and he stated that he is not opposed to this requested instruction.

WHEREFORE, PREMISES CONSIDERED, Mr. Grider respectfully requests this Honorable Court extend the deadline for him to file his Sentencing Memorandum as requested herein.

Date: May 4, 2023

Respectfully Submitted,

MAYR LAW, P.C.

by: /s/ T. Brent Mayr

T. BRENT MAYR

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ATTORNEY FOR THE DEFENDANT,
CHRISTOPHER RAY GRIDER

CERTIFICATE OF CONFERENCE

I certify that I conferred with Counsel for the Government, Francesco Valentini, and he is not opposed to this motion.

/s/ T. Brent Mayr

T. BRENT MAYR

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the Government, Francesco Valentini,, on May 4, 2023, via CM/ECF and email.

/s/ T. Brent Mayr

T. BRENT MAYR