

United States District Court  
District of Columbia

United States of America,

Plaintiff,

v.

Daniel Rodriguez,

Defendant.

Case No. 1:21-cr-00246-ABJ-1

**MOTION FOR LEAVE TO EXCEED PAGE LIMIT**

The defendant, Daniel Rodriguez, by and through his counsel of record, respectfully moves for an order allowing the reply to the government's sentencing memorandum exceed the five-page limit set by the Court. *See* June 18, 2023 Minute Order.

1. Sentencing is scheduled for June 21, 2023. Mr. Rodriguez filed a Sentencing Memorandum on June 9, 2023.
2. The Court permitted Mr. Rodriguez to file a reply to the government's Sentencing Memorandum, but limited the reply to five pages.
3. Mr. Rodriguez is seeking leave to file a 10-page reply to address both the restitution issue and other issues raised by the government. Mr. Rodriguez is not repeating any arguments.

Accordingly, Mr. Rodriguez requests this Court issue an Order allowing him to file a 10-page reply to the government's sentencing memorandum, exceeding the page limit set by the Court.

**Dated:** June 19, 2023.

Respectfully submitted,

RENE L. VALLADARES  
Federal Public Defender

By: */s/Rebecca A. Levy*  
*/s/Margaret W. Lambrose*  
*/s/Katherine A. Tanaka*

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REBECCA A. LEVY  
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Assistant Federal Public Defenders  
Attorneys for Daniel Rodriguez

**Certificate of Electronic Service**

I hereby certify on the 19th day of June 2023 a copy of same was electronically filed using the CM/ECF system and thus delivered to the parties of record and in pursuant to the rules of the Clerk of Court.

*/s/ Cecilia Valencia*

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Employee of the Federal Public  
Defender