

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

UNITED STATES OF AMERICA)	
)	Criminal No. 21-204 (BAH)
v.)	Chief Judge Howell
)	
MATTHEW BLEDSOE)	

MOTION TO EXTEND SELF-SURRENDER DATE

COMES NOW the defendant, Matthew Bledsoe, by and through undersigned counsel, and respectfully moves this Honorable Court to extend his self-surrender date to on or after January 2, 2023 or, if not that, to after the Thanksgiving weekend. In support of this motion for self-surrender, Mr. Bledsoe would show:

1. Mr. Bledsoe was sentenced in this case on October 21, 2022. He was given a 48-month prison sentence. At sentencing, the Court allowed Mr. Bledsoe to self-surrender to the Bureau of Prisons (BOP) once it has completed its designation process for him.
2. One of the reasons that Mr. Bledsoe asked to self-surrender was so that he could make arrangements in regards to his moving business to plan for his family financially while he is incarcerated. Mr. Bledsoe is currently restructuring his business so that certain trusted employees can assume a greater responsibility in running his business while he is incarcerated, and he is training these employees in their new duties and about how to manage the day-to-day affairs of the business.
3. Mr. Bledsoe has just received notice from the BOP that he is to self-surrender to the FCI in Forrest City, Arkansas on Thanksgiving Day—that is, November 24, 2022.
4. Mr. Bledsoe is requesting that his deadline for self-surrendering to BOP be extended to on or after January 2, 2023 so that he can complete his business arrangements and

finish training the people who will be taking over the day-to-day running of his business while he is serving his sentence.

5. In addition to being given more time to restructure his business and train his employees, Mr. Bledsoe is asking that his self-surrender date be extended for family reasons. Mr. Bledsoe has two daughters, aged six and eight. For Mr. Bledsoe to self-surrender during the holidays, will be particularly painful for Mr. Bledsoe and his family. This will be especially so if Mr. Bledsoe has to self-surrender on Thanksgiving Day. Mr. Bledsoe understands that he is the one to blame for the fact that he will have to be separated from his family to serve his sentence. However, delaying that separation until after Christmas will not relieve Mr. Bledsoe of his obligations to pay his debt to society, nor will it lessen the ultimate penological consequences that the Court intended for Mr. Bledsoe's sentence to have.

6. On November 2, 2022, undersigned counsel exchanged e-mails with Mr. Bledsoe's Pretrial Services Officer here in D.C., Christine Schuck. Mr. Schuck informed counsel that Mr. Bledsoe remains in compliance with his release conditions.

7. On November 3, 2022, undersigned counsel exchanged e-mails with Assistant United States Attorney Jamie Carter regarding this motion to extend Mr. Bledsoe's deadline for self-surrendering to BOP. Ms. Carter indicated that the government opposes any such motion.

WHEREFORE, the defendant, Matthew Bledsoe, moves this Honorable Court to allow him to self-surrender to the Bureau of Prisons on or after January 2, 2023 or, if not that, to a date after the Thanksgiving weekend.

Respectfully submitted,

/s/

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