

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

UNITED STATES OF AMERICA,	:	
	:	
v.	:	No. 1:21-cr-00447-CJN-03
	:	
JOSHUA CHRISTOPHER DOOLIN,	:	
et al.	:	

**CONSENT MOTION TO ENLARGE TIME
TO FILE SENTENCING MEMORANDA**

Joshua Christopher Doolin, by his undersigned counsel, hereby requests the entry of an Order enlarging the time within which the parties may file sentencing memoranda, up to and including Sunday, August 13, 2023. The following is stated in support thereof.

1. This Motion is consented to per AUSA Benet Kearney.
2. Sentencing is scheduled for August 16, 2023 at 2:00 p.m.
3. On June 21, 2023, the Court instructed counsel to file sentencing memoranda on or before August 9, 2023. (Minute Order)
4. Recently, USPO Robert Walters informed counsel that the final version of the Presentence Investigation Report should issue on August 9, 2023.
5. Following receipt of the final Presentence Investigation Report, undersigned counsel will need some time to review it with Mr. Doolin, then finalize and file the defendant's sentencing memorandum. Furthermore, undersigned

counsel will be out of the office (and out of the Washington Metropolitan Area) for a personal matter on August 10-11, 2023.

6. The enlargement of time requested herein will allow counsel the opportunity to have a full-some discussion with Mr. Doolin about the Presentence Investigation Report, as well as to properly finalize and file the defendant's sentencing memorandum.

WHEREFORE, for the foregoing reasons and such other reasons which may appear just and proper, Joshua Christopher Doolin hereby requests the entry of an Order enlarging the time within which the parties may file sentencing memoranda, up to and including Sunday, August 13, 2023.

Respectfully Submitted,

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Counsel for Joshua C. Doolin

CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2023, I caused a copy of the foregoing Consent Motion to Enlarge Time to File Sentencing Memoranda, and a proposed Order, to be served by CM/ECF to case registered parties.

Allen H. Orenberg