

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

UNITED STATES OF AMERICA)	Docket No. 1:21-cr-00035-RC-5
)	
)	
v.)	
)	
JACK WADE WHITTON,)	The Honorable Rudolph Contreras
)	
)	
Defendant.)	

**MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO THE FINAL
PRESENTENCE INVESTIGATION REPORT**

And now, to-wit, comes the Defendant, Jack Whitton (hereinafter “Mr. Whitton”), by and through his counsel, Komron Jon Maknoon, and respectfully submits the within Motion for Extension of Time to File Objections to the Final Presentence Investigation Report. In support thereof, he avers as follows:

1. On or about August 4, 2021, Mr. Whitton was indicted on alleged violations of 18 U.S.C. §§ 111 (a)(1), 18 U.S.C. §§ 111(a)(1)(b), and (2), 18 U.S.C. §§ 231(a)(3), 18 U.S. C. §§ 1752(a)(1), 18 U.S.C. §§ 1752(a)(2), 18 U.S. C. §§ 1752(a)(4), and 40 U.S.C. § 5104(e)(2)(F) (*See* ECF Doc. No. 92).

2. On or about November 17, 2021, a superseding indictment was filed alleging the same violations (*See* ECF Doc. No. 145).

3. On September 13, 2022, a Change of Plea was conducted pursuant to a Plea Agreement and Statement of the Offense (*See* ECF Doc. Nos. 225-6).

4. On November 15, 2022, a Draft Presentence Investigation Report was filed (*See* ECF Doc. No. 252).

5. On December 12, 2022, undersigned counsel respectfully entered his appearance on behalf of Mr. Whitton (*See* ECF Doc. No. 259).

6. On December 13, 2022, a Final Presentence Investigation Report was filed (*See* ECF Doc. No. 261).

7. Currently scheduled and due are any objections to the Final Presentence Investigation Report on December 27, 2022. Fed. R. Crim. P. 32.

8. Due to undersigned counsel's recent entry of appearance and the need to travel to Georgia to meet with Mr. Whitton who is incarcerated, additional time is needed to review relevant materials.

9. On December 20, 2022, Assistant United States Attorney Benet Kearney informed undersigned counsel that she consents to the relief sought within.

WHEREFORE, Mr. Whitton respectfully requests that this Honorable Court grant the Motion to Extend Time to File Objections to the Final Presentence Investigation Report until January 11, 2022, or a date deemed more appropriate by this the Court.

Respectfully submitted,

/s/ Komron Jon Maknoon
Komron Jon Maknoon, Esquire
PA I.D. No. 90466

Maknoon & Associates, LLC
309 Smithfield St., 4th Floor
Pittsburgh, PA 15222
(412) 201-1802
(412) 774-8424 FAX