

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

LONNIE LEROY COFFMAN,
Defendant.

Case Nos.: 21-cr-004 (CKK)
21-cr-614 (CKK)

*CONSENT MOTION TO CONTINUE DUE DATE
FOR SUBMISSION OF DEFENSE SENTENCE MEMORANDUM*

COMES NOW DEFENDANT, Lonnie Leroy Coffman, by and through undersigned counsel and respectfully requests that this Court continue the date by which the parties are required to file sentence memorandum to Wednesday, March 2, 2022.

This motion is made with the consent of government counsel. Additionally, both parties submit it would be appropriate to file defense and government sentence memorandum on the new date the Court may set.

In support of this motion, the defendant states:

1. Mr. Coffman is currently detained at USP Lewisburg, in Pennsylvania. His contact with defense counsel has limited due to the need to schedule video, or telephone, conferences ahead of time and subject to Bureau of Prisons limitations.¹

¹ As an example of such limitations, the Bureau of Prisons (BOP) recently shutdown facilities nationwide, including USP Lewisburg, after two inmates were killed because of violence at a BOP facility in Texas. The nationwide BOP shutdown, and inmate lockdown, ran from late January 2022 through the following week beginning with Monday, February 7, 2022.

2. Undersigned counsel requires additional time to complete Mr. Coffman's sentence memorandum and to confer with Mr. Coffman via video link prior to filing.

Wherefore, Mr. Coffman respectfully requests that the Court set a new date by which the defense sentencing memorandum shall be filed. The date of Wednesday, March 2, 2022, is requested.

As noted above, government counsel has consented to this motion and the request for a new filing date. In consultation with government counsel, both parties believe and submit to the Court that, should the Court grant this motion, that the filing date be the same for the government sentencing submission. A proposed order is filed with this motion.

Filed this 25th of February 2022.

Respectfully submitted,

RETURETA & WASSEM, P.L.L.C.



By: _____
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing filing was served upon counsel for all parties via electronic mail on this 25th of February 2022.



By: _____
Manuel J. Retureta, Esq.