

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)

v.)

CR. NO. 1:21-CR-384 (RDM)

MICAJAH JOEL JACKSON)

_____)

**UNOPPOSED MOTION FOR LEAVE TO FILE REPLY TO GOVERNMENT'S
SENTENCING MEMORANDUM**

Micajah Jackson, through undersigned counsel, respectfully requests permission to submit a reply to the government's sentencing memorandum filed on February 20, 2021 based on the following reasons:

1. Mr. Jackson submitted his sentencing memorandum under seal on February 8, 2022, prior to the government's submission of its sentencing memorandum, and submitted a redacted version on February 22, 2022.
2. In addition to Mr. Jackson's wish to respond to the general content of the government's sentencing memorandum, Mr. Jackson also wishes to respond to the government's argument that both a period of incarceration and a period of imprisonment is permissible for a petty offense. Undersigned counsel believes this would be an illegal sentence if imposed by the Court and wishes to provide legal support for this position.
3. Undersigned counsel has conferred with government counsel, who has no objection to this request.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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