## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

v. : No. 1:21-cr-00350-PLF

:

ANTIONNE BRODNAX,

:

Defendant. :

## GOVERNMENT'S CONSOLIDATED MOTION FOR ENLARGEMENT OF TIME TO SUBMIT SENTENCING MEMORANDUM (UNOPPOSED) AND MOTION TO CONTINUE SENTENCING

The United States of America, by and through the United States Attorney for the District of Columbia, hereby moves for an enlargement of time to submit its sentencing memorandum in the above matter, from today to January 18, 2022, and to continue sentencing to a date during the time period of February 11 to 18, 2022. The enlargement of time for submission of the memorandum is needed in order for the government to continue to work through complicated issues regarding application of the U.S. Sentencing Guidelines to this case. Counsel for the defense has advised that the defense has no objection to the enlargement of time for the government to file its sentencing memorandum.

Continuance of the sentencing date, from January 27, 2022, is needed in order to allow the defense to respond to the government's sentencing memorandum and for the Court to fully consider the issues in advance of sentencing. Defense counsel has not yet advised as to her position regarding the government's motion to continue the sentencing.

A proposed Order is attached.

Respectfully submitted,

MATTHEW M. GRAVES UNITED STATES ATTORNEY

by: /s/Michael C. Liebman

Michael C. Liebman
D.C. Bar No. 479562
Assistant United States Attorney
555 4th Street, N.W., room 9106
Washington, D.C. 20530
202-252-7243
202-353-9415 (fax)
michael.liebman@usdoj.gov