

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

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|---------------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA | : | |
| | : | |
| v. | : | Case No. 21-CR-271 (EGS) |
| | : | |
| [1] DAWN BANCROFT, | : | |
| [2] DIANA SANTOS-SMITH | : | |
| | : | |
| Defendants. | : | |

**UNOPPOSED MOTION TO EXTEND SENTENCING MEMORANDA
DEADLINES AND SENTENCING BY THIRTY DAYS**

The United States of America hereby requests that this Court continue the deadlines set on the docket in its MINUTE ORDER dated October 11, 2021, for a period of thirty days. This would require the government to file its sentencing memoranda as to the defendants by no later than February 24, 2022; the defendants to file their respective memoranda by no later than March 3, 2022; and the government to file its reply, if any, by Monday, March 7, 2022.¹ No prior extensions have been sought and the government is not making this request to delay the sentencing or for any other improper purpose.

One reason for the request is the government recently learned that at least one defendant, but perhaps other defendants, have referred to the facts of defendant Dawn Bancroft's case in their sentencing memoranda, and the government would like an opportunity to get the transcript and filings for those proceedings and evaluate any impact they may have on the sentencing memoranda in this case. *See, ex.*, SENTENCING MEMORANDUM by CLEVELAND GROVER MEREDITH, JR, 21-CR-159 (ABJ), ECF No. 56, p. 23.

The government has conferred with counsel for each defendant, and both attorneys have

¹ Thirty days from February 4, 2022, falls on March 6, a Sunday.

indicated that the government's request for an extension of thirty days to file its sentencing memoranda may be filed as unopposed.

Respectfully submitted,

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