

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

**UNITED STATES OF AMERICA** )  
 )  
 v. )  
 )  
**CLEVELAND GROVER** )  
**MEREDITH, JR.** )  
 )  
 **Defendant** )  
\_\_\_\_\_ )

**Crim. No. 1:21-cr-00159 (ABJ)**

**JOINT MOTION FOR BRIEF EXTENSION OF TIME  
TO FILE SENTENCING MEMORANDA**

Pursuant to the Court’s Minute Order of 9/10/21, the Sentencing Memoranda from the parties are due by December 6, 2021. The Government and Defendant Cleveland Grover Meredith, Jr., through undersigned counsel, hereby jointly move the Court for a brief extension, until December 8, 2021, within which to file their respective Sentencing Memoranda. This additional time will ensure that a finalized Presentence Investigation Report (PSR) is filed prior to the parties’ Sentencing Memoranda. In support of this Motion, the parties state as follows:

On September 10, 2021, the Court ordered the parties to file any sentencing memorandum by December 6, 2021. On November 9, 2021, the USPO submitted to the parties a draft presentence investigation report. Thereafter, both parties provided the USPO with a list of possible inaccuracies in the report. USPO has advised the parties that the final version of the PSR is due to be filed by December 7, 2021, although USPO anticipates filing the PSR on December 6, 2021. The parties request a brief extension of two days – through December 8, 2021 – within which to file their respective Sentencing Memorandum so as to allow time to review the final PSR and address its contents.

**WHEREFORE**, the Government and Defendant Cleveland Grover Meredith, Jr. respectfully request that the parties be given until December 8, 2021 to file their respective Sentencing Memoranda.

Respectfully submitted,

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KIYONAGA & SOLTIS, P.C.

/s/ Paul Kiyonaga

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December 4, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of December, 2021, a true and correct copy of the foregoing Joint Motion was served via the ECF system on all attorneys of record.

/s/ Paul Y. Kiyonaga

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Paul Y. Kiyonaga