

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, )  
 )  
 v. ) CRIMINAL CASE NO.  
 ) 1:21-CR-00346-BAH-1  
GLEN MITCHELL SIMON )

UNOPPOSED MOTION TO EXTEND FILING  
DEADLINE FOR SENTENCING MEMORANDUM

COMES NOW the Defendant, GLEN MITCHELL SIMON, by and through undersigned counsel and respectfully requests a 3-day extension of time in which to file Mr. Simon's sentencing memo. Sentencing is currently scheduled for August 12, 2022 at 11:00 a.m. before the Honorable Judge Beryl A. Howell. In support of this Motion, Defendant shows as follows:

1.

After being charged in a criminal complaint from this district, Mr. Simon was arrested in the Northern District of Georgia and made his initial appearance there on May 5, 2021. (CM/ECF for N.D. Ga., Case no. 2:21-mj-09 at Docs. 1, 4). The magistrate judge held a detention hearing, and Mr. Simon was released on conditions of supervision. (CM/ECF for N.D. Ga., Case no. 2:21-mj-09 at Docs. 6, 7, 8). A criminal information was thereafter filed in this district. (Doc. 6).

Mr. Simon was arraigned on the information on May 12, 2021 and was ordered to remain under the same conditions of release. (Doc. 16). He resides in

the Northern District of Georgia, and is subject to supervision by federal probation officers there. He has not had any issues or violations while on pretrial release.

2.

Simon pled guilty to one count of violating 18 USC § 1752(a)(2): Disorderly and Disruptive Conduct in a Restricted Building or Grounds on April 29, 2022, and sentencing is scheduled for August 12, 2022. (Min. Entry 4/29/22). According to the Court's Standing Order for Criminal Cases, Mr. Simon's sentencing memo is due 10 days before sentencing with a response due seven days before sentencing. (Doc. 8). Accordingly, Mr. Simon's sentencing memo is due today, and a response is due August 5, 2022.

3.

Counsel for Mr. Simon is currently in trial out of district. Counsel, in her capacity as a public defender, is lead counsel in a homicide trial in Oklahoma that started on July 28, 2022. As a result, Counsel has not had adequate time to prepare and submit a sentencing memo for Mr. Simon. Counsel requests that the deadline to file Mr. Simon's sentencing memo be extended to August 5, 2022, seven days before sentencing.

4.

Counsel has conferred with Assistant United States Attorney ("AUSA") Barry Disney regarding this extension, and he has no objection to this motion.

WHEREFORE, Mr. Simon respectfully requests that he be given until August 5, 2022, to file a sentencing memorandum on his behalf. A proposed Order is attached.

Dated: This 2nd day of August, 2022.

Respectfully Submitted,

/s/ Rebecca Shepard

Rebecca Shepard

Georgia Bar No. 780692

Attorney for Glen Simon

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Unopposed Motion to Continue Defendant's Pretrial Motions Filing Deadline and Pretrial Conference has been formatted in Times New Roman 14 pt., in accordance with Local Rule 5.1B, and was electronically filed this day with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following counsel of record:

Barry Disney, Esq.  
Assistant United States Attorney  
555 4th Street, NW  
Washington, DC 20530

Dated: This 2nd day of August, 2022.

/s/ Rebecca Shepard  
Rebecca Shepard  
Georgia Bar No. 780692  
Attorney for Glen Simon

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