

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

21-CR-00181

v.

DANIEL RAY CALDWELL.
Defendant.

UNOPPOSED MOTION FOR LEAVE TO FILE OUT OF TIME

Comes now the defendant, DANIEL RAY CALDWELL, and moves this Honorable Court for leave to file his Position on Sentencing out of time by 1 calendar day. Counsel the defendant avers that the government does not oppose this request. Defendant's sentencing memorandum was ordered to be filed no later than January 17, 2023. Due to other scheduled commitments on defense counsel it was not filed until January 18, 2023. Failure to comply with the order of this Honorable Court was not willful. Sentencing in this matter is set for February 1, 2023. There is no prejudice to the government by the granting of this request.

I ASK FOR THIS:

_____/s/_____
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Counsel for Defendant DANIEL RAY CALDWELL

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and accurate copy of the foregoing to be served upon all counsel of record via ECF on January 18, 2023.

_____/s/_____
Robert L. Jenkins, Jr., Esq.
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