

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	No. 1:21-cr-00044-CJN
	:	
DANIEL D. PHIPPS,	:	
	:	
Defendant.	:	

GOVERNMENT’S OPPOSITION TO DEFENDANT’S MOTION TO DELAY SURRENDER

The United States of America, by and through the United States Attorney for the District of Columbia, hereby opposes defendant’s motion to delay surrender (ECF no. 71). The government submits that defendant’s appellate counsel will not be unduly hindered in having confidential communications with the defendant, should the Court deny the motion. In addition, the very nature of permitting self-surrender is to allow a convicted defendant, facing a sentence of incarceration, to get his affairs in order. This should include making arrangements to retain, or to seek appointment of, and then meet with appellate counsel, prior to surrendering. This defendant was sentenced on August 11, 2023. He has therefore had two months to make such arrangements and meet with appellate counsel.

Accordingly, the motion should be denied.

Respectfully submitted,

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