

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

CASE NO. 1:21-CR-00421-JDB-1

JOHN MARON NASSIF

/

MOTION TO FILE
SENTENCING MEMORANDUM OUT OF TIME

The Defendant, John Maron Nassif, by and through his undersigned attorney, moves this Honorable Court to enter its order allowing undersigned counsel to file his sentencing memorandum out of time. As grounds in support thereof, the undersigned states the following:

1. Undersigned counsel represents the Defendant, John Nassif, in the above-styled case.
2. That the deadline for filing the sentencing memorandum in this case was yesterday, April 20, 2023.
3. That the undersigned was not able to finish the sentencing memorandum in time to file it by this Court's deadline.
4. That the undersigned has completed said sentencing memorandum and will be filing the same today.

5. That the undersigned moves this Honorable Court to accept the filing of the sentencing memorandum out of time.

6. That the undersigned apologizes to this Honorable Court, and opposing counsel, for not filing this sentencing memorandum in a timely fashion and respectfully requests that this Court allow the filing of this memorandum on today's date.

Respectfully submitted,

A. Fitzgerald Hall, Esq.
Federal Defender, MDFL

/s/ James T. Skuthan
James T. Skuthan, Esq.
First Assistant Federal Defender
Florida Bar Number 0544124
201 South Orange Avenue, Ste. 300
Orlando, Florida 32801
Telephone: 407-648-6760
Facsimile: 407-648-6095
E-Mail: jim_skuthan@fd.org
Counsel for the Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of April 2023, a true and correct copy of the foregoing was furnished by using the CM/ECF system to the Clerk of the Court, which will send notice of such filing to all counsel of record.

/s/ James T. Skuthan
James T. Skuthan, Esq.