## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)
v.	) Criminal No. 1:21-cr-35-RC-2
PETER FRANCIS STAGER,	)
Defendant.	)

## <u>DEFENDANT STAGER'S UNOPPOSED MOTION TO EXTEND SENTENCING</u> <u>MEMORANDUM AND RESPONSE DEADLINES</u>

Peter Francis Stager, by and through undersigned counsel, respectfully requests that this Honorable Court extend the deadline in which to file a Memorandum in Aid of Sentencing from June 28, 2023 to July 7, 2023 and extend the deadline in which to file a Sentencing Response from July 12, 2023 to July 14, 2023. In support of this Motion, counsel submits the following:

- 1. On February 16, 2023, the Court entered a Scheduling Order setting a sentencing hearing for July 24, 2023 and establishing the Sentencing Memorandum and Sentencing Response deadlines of June 28, 2023 and July 12, 2023, respectively. *See* ECF No. 282.
- 2. Undersigned counsel requires more time to draft a Memorandum in Aid of Sentencing, as she has been dealing with a health concern the past few weeks.
  - AUSA Benet Kearney does not oppose this Motion.
     In light of the foregoing, Mr. Stager requests the aforementioned relief.

## Respectfully submitted,

\_\_\_\_\_\_/s/\_\_ David Benowitz, D.C. Bar No. 451557 Amy C. Collins, D.C. Bar No. 1708316 Price Benowitz, LLP 409 7th Street, NW Suite 200 Washington, D.C. 20004 (202) 417-6000 David@PriceBenowitz.com AmyC@PriceBenowitz.com

Counsel for Peter Francis Stager

## **CERTIFICATE OF SERVICE**

I hereby certify that, on this 22nd day of June 2023, I caused a true and correct copy of the foregoing Unopposed Motion to be delivered via CM/ECF to the parties in this matter.

/s/	
Amy C. Collins	