UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
v.)
PETER FRANCIS STAGER,)
Defendant.)

Criminal No. 1:21-cr-35-EGS-2

DEFENDANT STAGER'S SECOND UNOPPOSED MOTION TO EXTEND SENTENCING MEMORANDUM AND RESPONSE DEADLINES

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 July 7, 2023 to July 14, 2023 and extend the deadline in which to file a Sentencing Response from July 14, 2023 to July 21, 2023. In support of this Motion, Mr. Stager submits the following:

1. On February 16, 2023, the Court entered a Scheduling Order setting sentencing 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. On June 22, 2023, undersigned counsel filed an Unopposed Motion to Extend Sentencing Memorandum and Response Deadlines. *See* ECF No. 324.

3. On June 23, 2023, the Court entered a Minute Order granting undersigned counsel's Unopposed Motion to Extend Sentencing Memorandum and Response Deadline. *See* Minute Order (Jun. 23, 2023).

4. Undersigned counsel requires more time to draft a Memorandum in Aid of Sentencing, as she continues to deal with the previously cited health concern. *See* ECF No. 324.

5. AUSA Benet Kearney does not oppose this Motion.

In light of the foregoing, Mr. Stager requests the aforementioned relief.

Respectfully submitted,

/s/

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Counsel for Peter Francis Stager

CERTIFICATE OF SERVICE

I hereby certify that, on this 5th day of July 2023, I caused a true and correct copy of the foregoing Second Unopposed Motion to be delivered via CM/ECF to the parties in this matter.

/s/_____ Amy C. Collins