

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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|--|---|---------------------|
| UNITED STATES |) | |
| |) | |
| v. |) | Case No. 1:21-cr-38 |
| |) | |
| BARNETT |) | |
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**MOTION FOR EXTENSION TO FILE RESPONSE TO PRESENTENCE
INVESTIGATION REPORT**

On March 28, 2023, a Senior United States Probation Officer filed a Presentence Investigation Report. ECF No. 186. The Defendant has until April 12, 2023, to submit a response. April 12 coincides with the Jewish holiday of Passover, and the Defendant’s attorney is Jewish and strictly observes the holiday. Accordingly, the Defendant respectfully requests that the Court grant a brief extension to compensate for the week of Passover, and extend the due date until Monday April 21, 2023.

The Defendant also notes that the sentencing memorandums are due on April 26, 2023, and the sentencing hearing is scheduled for May 3, 2023. The Court has already expressed that because the Rule 29 and Rule 33 motions are still pending, the Court would consider continuing the sentencing hearing. The Defendant would add that the Defendant’s and the Government’s sentencing memorandums are due on April 26, 2023, and a sentencing hearing of May 3 does not leave time for responses, replies, or for the Court to consider the sentencing memorandums and accompanying briefs. As today, April 3, 2023, the parties will meet for a status conference, the Defendant respectfully requests that at the hearing the Court address the issue of a continuance for the sentencing hearing and accompanying deadlines, and grant a reasonable continuance accordingly.

CONCLUSION

For the foregoing reasons, the Defendant respectfully requests that the Court grant an extension to file a response to the presentence report until April 21, 2023, and that the Court consider granting a reasonable continuance for the sentencing hearing scheduled for May 3, 2023.

Dated: April 3, 2023

Respectfully submitted

/s/ Jonathan Gross
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being served on opposing counsel via email on

April 3, 2023.

/s/ Jonathan Gross