

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
WASHINGTON, D.C.**

UNITED STATES OF AMERICA

v.

**CRIMINAL CASE NO.
1:21-CR-00116-DLF**

WILLIAM MCCALL CALHOUN, JR.
Defendant.

**MOTION FOR EXTENSION OF TIME TO FILE
DEFENDANT’S SENTENCING MEMORANDUM**

COMES NOW, Defendant, William McCall Calhoun, Jr., by and through undersigned counsel, and hereby files this motion for additional time for the filing of his Sentencing Memorandum.

(1)

On April 24, 2023 this Court entered a Minute Order ordering the parties to file their sentencing memoranda on or before July 21, 2023.

(2)

On June 29, 2023, the United States Probation Office file Defendant’s Presentence Report.

(3)

On July 14, 2023, Defendant filed his Obligation and Response to Presentence Report, and his Objections to Presentence Report. To date, Defendant has not received notice of the Government's Obligation and Response to Presentence Report.

(4)

Defendant is requesting an additional 3 days to complete and file his Sentencing Memorandum. He is waiting for an additional few exhibits that he would like to include as evidence in support of his arguments within the memorandum, evidence that he believes is pertinent for the Court to consider.

(5)

In consideration of the above, counsel requests that the Court extend the Defendant's filing deadline for his Sentencing Memorandum to Monday, July 24, 2023.

WHEREFORE, Defendant respectfully requests that the Court grant his motion for extension of time.

Respectfully submitted, this 21st day of July 2023.

/s/ Jessica N. Sherman-Stoltz

JESSICA N. SHERMAN-STOLTZ, ESQ.

VIRGINIA STATE BAR NO. 90172

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CERTIFICATE OF SERVICE

I hereby CERTIFY that on this the 21st day of July 2023, a true and correct copy of the foregoing *Motion for an Extension of Time to File Defendant's Sentencing Memorandum* with the Clerk of Court via the CM/ECF system, which will automatically send an email notification of such filing to all counsel of record.

/s/ Jessica N. Sherman-Stoltz

Jessica N. Sherman-Stoltz, Esq.

Virginia State Bar #90172

Sherman-Stoltz Law Group, PLLC.