

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

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
vs.)	Case No. 1:21-cr-00201
)	
MICHAEL AARON QUICK,)	
STEPHEN BRIAN QUICK,)	
ZACHARY HAYES MARTIN,)	
)	
Defendant.)	

**MOTION FOR LEAVE TO LATE FILE SENTENCING MEMORANDUM ONE DAY
LATE**

COMES NOW Defendants by and through Counsel, Joseph S. Passanise and Taylon Sumners of the WAMPLER AND PASSANISE LAW OFFICE and moves this Court for an extension of time to file the Sentencing Memorandums one day late due on March 10, 2022 in accordance with the Legal Suggestions attached hereto:

LEGAL SUGGESTIONS

1. Defendants have been charged with crimes that could carry an extensive sentence.
2. Counsel has had numerous trials and depositions take place as of recent.
3. Counsel spoke with AUSA Chief Deputy, Michael DiLorenzo who does not oppose the Defendant’s request for a one-day extension for the filing of the sentencing memos.
4. This cause is currently set for Sentencing on March 17, 2022.
5. That Counsel requests an extension of time for one day to file the Sentencing memos.

WHEREFORE, Counsel prays for an Order of this Court extending the time of one day for the filing of the sentencing memos to March 10, 2022, and for such other and further relief as the Court deems just and proper.

Respectfully Submitted

/s/Joseph Passanise
JOSEPH S. PASSANISE, MO Bar #46119
TAYLON SUMNERS, MO Bar #73114
Attorneys for Defendant

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Certificate of Service

I hereby certify that on March 10, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to U.S. Attorney, Springfield, Missouri.

/s/Joseph Passanise
Joseph S. Passanise
Taylon Sumners
Attorneys at Law