

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

UNITED STATES OF AMERICA

vs.

USDC Case: 21-0640(TFH)

DARRELL ALAN YOUNGERS

Defendant

**MOTION FOR EXTENSION OF TIME TO FILE SENTENCING
MEMORANDUM AND TO CONTINUE SENTENCING HEARING**

Darrell Alan Youngers, through his attorneys from the Federal Public Defender, respectfully files this motion requesting additional time to submit a Sentencing Memorandum on his behalf, and to reschedule the sentencing hearing in the present case. Accordingly, Mr. Youngers states and prays as follows:

The undersigned is in the process of gathering information to include in the sentencing memorandum that will be submitted on Mr. Youngers' behalf. To date, we have not received the sum of the documents needed to properly brief this Honorable Court as to the appropriate sentence in this case. As a result, we must

plead for additional time to properly inform this Honorable Court as to the objections to the PSR to be filed on Mr. Coles' behalf.

Moreover, this Honorable Court set the sentencing hearing in this case for August 22nd, 2022. However, the sentencing hearing date coincides with the Southern District of Texas' Federal Defenders Conference. On that date, and through the following Friday, all the personnel from the several offices of the Federal Public Defender that comprise the Southern District of Texas will meet in San Antonio for their annual meeting. Federal Defender Marjorie Meyers informed all the personnel that assistance to the Conference is mandatory. Furthermore, the undersigned will offer a continuous legal education seminar to the rest of the Assistant Federal Public Defenders on August 26th, 2022. As a result, it will be impossible to the undersigned to comply with both obligations, since there is a need to travel to San Antonio for the Conference.

As this Honorable Court is aware, Mr. Youngers has complied with all the requisites of his pretrial release. He does not constitute a risk of flight, nor a danger to the community. In order to properly prepare for sentencing hearing, we need additional time to gather the necessary documentation to file our objections, and the subsequent sentencing memorandum that will be filed on his behalf.

Thus, Mr. Youngers prays that this Honorable Court grants a 30 day extension to the deadline to file a sentencing memorandum and, in turn, reschedules the sentencing hearing on this case.

Respectfully submitted,

MARJORIE A. MEYERS
Federal Public Defender
Southern District of Texas No. 3233
Texas State Bar No. 14003750

By /s/ Alex Omar Rosa-Ambert
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CERTIFICATE OF SERVICE

I certify that on August 15, 2022, a copy of the foregoing was served by Notification of Electronic Filing to all the parties of record.

/s/ Alex Rosa-Ambert
ALEX ROSA-AMBERT

