

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

UNITED STATES OF AMERICA)	
)	
v.)	
)	CRIM NO. 22-CR-243(CKK)
JODI WILSON,)	
)	Judge: Kollar-Kottely
)	
Defendant.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE MOTION FOR RECONSIDERATION**

COMES NOW Jodi Wilson, through counsel, and, with no opposition from the government, requests that the court grant an extension of time of ten (10) days to file a motion for reconsideration. As reasons therefor, defendant states as follows:

1. On June 5, 2023, Ms. Wilson was sentenced on Count 4 to twenty (20) days incarceration, thirty-six (36) months term of probation; and a Special Assessment of \$10.00. Upon the defense’s request, Ms. Wilson was given until June 20, 2023, to file a post-sentencing pleading.

2. Due to administrative delays, defense counsel has been unable to order and therefore unable to receive court transcripts from the plea hearing held on December 14, 2022.¹

3. The parties wish for the June 20, 2023, deadline to be extended for an additional ten (10) days to allow for Ms. Wilson and counsel to receive and review the court transcripts and proceed with filing a motion for reconsideration.

4. Undersigned counsel has been in contact with AUSA Anita Eve and the government does not oppose this motion.

WHEREFORE, the defendant requests an extension of an additional ten (10) days from June 20, 2023, to file a post-sentencing pleading.

Respectfully submitted,

JODI WILSON
By Counsel

/s/ John L. Machado
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¹ A good portion of the delay was due to the fact that the CJA voucher prepared in this matter, which is required for issuing transcripts, was provided without the criminal case number (it was issued with the magistrate case number). Accordingly, the federal Public Defender Services needed to make that administrative change to the voucher. There was a delay in PDS making the correction and counsel only was able to resubmit upon completion of that correction. The transcript request has been resubmitted to chambers (after another minor correction was made) and the defense is awaiting for court approval of the voucher to prepare the transcript at this time. It should take three (3) business days upon approval for the voucher for the transcript to be completed.

Certificate of Service

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 16th day of June, 2023, which will send a notification of such filing (NEF) to the following to all counsel of record.

/s/John L. Machado

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