

**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 twelve (12) 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. On June 16th, 2023, undersigned counsel filed a motion for extension of time to file its motion for consideration. The court granted the motion and the court granted an extension until June 30th, 2023

3. Due to administrative delays due to processing the voucher, the order for

the required transcript was delayed in getting to chambers for approval. It appears that the order was signed by the court on June 23, 2023, despite having been most recently submitted on June 15, 2023. To date, the transcript has not been received by counsel.

4. The defense requests that the deadline be extended for an additional twelve (12) days to allow for Ms. Wilson and counsel to receive and review the court transcripts and proceed with filing a motion for reconsideration.

5. 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 twelve (12) days to July 10, 2023, to file a post-sentencing pleading.

Respectfully submitted,

JODI WILSON
By Counsel

/s/ John L. Machado
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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 28th 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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