

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)
)
 v.) USDC No. 21-cr-649 (JDB)
)
 Michael Dickinson, *defendant*.)

UNOPPOSED MOTION TO ENLARGE TIME
FOR SUBMISSION OF PRESENTENCE REPORT

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., (“counsel”) appointed by this Court under the Criminal Justice Act, with no opposition from the United States, moves the Court to enlarge time for the submission of the presentence investigation report (“PSI”). Currently the PSI is due on Dec. 6, 2022, per Judge Emmet G. Sullivan’s previous Order in this case, entered on Sept. 6, 2022, following the defendant’s plea hearing. (*See* ECF docket Minute Entry) Through no fault of the U.S. Probation Office, U.S. Probation Off. Robert Walters, assigned to conduct the investigation and prepare the report, was not able to interview the defendant until last week, despite the efforts counsel and Mr. Walters to schedule it with the defendant earlier. Mr. Walters advises that he faces a time constraint set by Congress and expressed the need to counsel for either an enlargement of time for the submission of the PSI or a continuance of the sentencing hearing.

Mr. Walters advises counsel that he would request a new deadline set during the first week of January, 2023. That would provide him roughly an additional month in which to complete his investigation and submit the report.

This Court, after having been randomly assigned this case from Judge Sullivan on October 18, 2022, reiterated the scheduling for submission of sentencing memoranda and replies

that Judge Sullivan ordered on Sept. 6, 2022. Neither party objected, after having been contacted by the Court's courtroom deputy Tim Bradly, to keeping the same schedule.

For the reasons stated, the defendant moves to enlarge the time available for the submission of the PSI to the Court.

A proposed Order is attached.

WHEREFORE, the defendant respectfully moves the Court to grant said relief.

This pleading is,

Respectfully submitted,

/s/

NATHAN I. SILVER, II
Unified Bar #944314
6300 Orchid Drive
Bethesda, MD 20817
(301) 229-0189 (direct)
(301) 229-3625 (fax)
email: nisquire@aol.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Barry K. Disney, Esq., U.S. Dept. of Justice-CRM, 1331 F Street, N.W., Washington, D.C. 20005, attorney of record for the government in the instant case, and to Robert Walters at robert_walters@dcp.uscourts.gov, this 7th day of November, 2022.

/s/

Nathan I. Silver, II