UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

Case No.: 21-cr-667 (RCL)

v.

:

MAHAILYA PRYER,

:

MAHAILYA PRYEK,

:

Defendant. :

UNOPPOSED MOTION FOR EXTENSION OF TIME TO SUBMIT BRIEFING AND MODIFY CONDITIONS OF RELEASE

The United States of America, through undersigned counsel, hereby moves to extend the current deadline for the government to respond to the Court's order for briefing regarding the impact of the D.C. Circuit's decision in *United States v. James Little*, No. 22-3018 on this matter. The government requests an extension of the deadline to respond from September 4, 2023 to September 15, 2023 as it continues to assess *Little*'s implications on defendants who received a split sentence, the proper remedy for such defendants, and what further appellate review the government will seek. The defendant has indicated to the government that they do not oppose this second extension.

Additionally, the parties jointly request that the defendant's conditions of release be modified to remove location monitoring during the pendency of the defendant's revocation proceedings. Probation does not oppose this request.

Respectfully submitted,

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