

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

1:21CR00698-001

v.

MARCOS GLEFFE.

Defendant.

MOTION FOR LEAVE TO FILE
DEFENDANT'S MEMORANDUM IN AID OF SENTENCING OUT OF TIME

Comes now, the defendant MARCOS GLEFFE, by and through counsel and moves this Honorable Court for leave to file his Memorandum in Aid of Sentencing out of time. In support of which, counsel for the defendant states the following:

1. On November 15, 2022, this Honorable Court directed counsel to file the defendant's memorandum in aid of sentencing on or before December 9, 2022.
2. On December 11, 2022, counsel for the defendant file the memorandum in aid of sentencing. The filing was 2 days outside of the deadline established by the Court.
3. Counsel's failure to comply with the deadline was not willful or the by-product of neglect.
4. On October 17, 2022, counsel began a RICO/homicide multi-defendant jury trial in the Circuit Court for the City of Alexandria. The trial was originally estimated to conclude on or before December 2, 2022. However, due to multiply interruptions attributable to COVID-19 the trial remains in session at the time of this writing.
5. As a consequence of counsel's attention being sharply focused on the aforementioned jury trial he failed to comply with this Honorable Court's deadline.

6. Counsel's failure to comply with the filing deadline has caused no prejudice to the government.
7. The defendant's memorandum in aid of sentencing was filed 6 calendar days prior to the scheduled sentencing hearing.
8. On December 10, 2022, counsel for the defendant attempted to reach government counsel to inquire her position on the instant request. At the time of this filing no response has been received.

Wherefore the defendant, **MARCOS GLEFFE**, respectfully requests that this Honorable Court sentence to grant him leave to file his memorandum in aid of sentencing out of time.

I ASK FOR THIS:

_____/s/_____
Robert L. Jenkins, Jr., Esq.
United States District Court Bar No.: CO0003
Bynum & Jenkins Law
1010 Cameron Street
Alexandria, Virginia 22314
(703) 309 0899 Telephone
(703) 549 7701 Fax
RJenkins@BynumAndJenkinsLaw.com
Counsel for Defendant MARCOS GLEFFE

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and accurate copy of the foregoing to be served upon all counsel of record via ECF on December 10, 2022.

_____/s/_____
Robert L. Jenkins, Jr., Esq.

United States District Court Bar No.: CO0003

Bynum & Jenkins Law

1010 Cameron Street

Alexandria, Virginia 22314

(703) 309 0899 Telephone

(703) 549 7701 Fax

RJenkins@BynumAndJenkinsLaw.com

Counsel for Defendant MARCOS GLEFFE