

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

EDWARD VALLEJO,

Defendant.

No. 22-cr-15 (APM)

MOTION FOR LEAVE TO FILE SENTENCING MEMORANDUM OUT OF TIME

Mr. Vallejo, through counsel, respectfully moves for leave to file the attached memorandum in aid of sentencing one business day out of time. Although the brief was substantially completed by the deadline, the process of locating and inserting citations and formatting descriptions of the hundreds of January 6 cases cited in the memorandum proved time-consuming and pushed the completion of the brief into the following day. In addition, counsel continued to receive letters of support through the deadline that materially affected the contents. Finally, the sheer volume of issues presented by the factual record and the PSR objections merited a submission that counsel unfortunately was unable to complete before the deadline. Counsel believed that the extra time would be useful to all parties to ensure that the sentencing issues are thoroughly and efficiently considered, and notes that other defendants have also filed on this date. He humbly asks that the Court not prejudice Mr. Vallejo for this delay.

WHEREFORE, Mr. Vallejo respectfully requests leave to file the attached Sentencing Memorandum and Supporting Exhibits one day out of time.

May 8, 2023

Respectfully submitted,

/s/ Matthew J. Peed

Matthew J. Peed (D.C. Bar No. 503328)

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