

In the United States District Court
for the District of Columbia

United States of America,)	Case No. 1:21-cr-00660-RBW
)	
)	
v.)	
)	
Daniel Michael Morrissey,)	
)	
Defendant)	
)	

Unopposed Motion for Order Extending Time to Surrender

Defendant Daniel Morrissey, by and through his attorney of record, Anthony M. Solis, moves this Court for an order extending the time within which Mr. Morrissey must surrender to the Bureau of Prisons to and including November 28, 2022. This motion is based upon the attached Declaration of Anthony Solis.

Dated: September 9, 2022

Respectfully submitted,

Anthony M. Solis,
A Professional Law Corporation

Anthony M. Solis /s/
By: Anthony M. Solis
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Declaration of Anthony M. Solis

Anthony M. Solis declares as follows:

1. I am an attorney at law licensed to practice in this district. I represent the defendant, Daniel Morrissey, in this matter.

2. Mr. Morrissey was sentenced on August 16, 2022, among other terms, to serve 45 days in custody and to surrender to serve that sentence as directed by the Bureau of Prisons (BOP).

3. Mr. Morrissey has been informed by the BOP that he is to surrender by or before September 28, 2022.

4. As the Court is aware from the information contained in the PSR, Mr. Morrissey relocated to the Austin, TX area to care for his elderly parents. In or about July of this year, Mr. Morrissey's father passed away, leaving his mother alone. Mr. Morrissey manages her care. Mr. Morrissey has endeavored to secure care for his mother during his impending incarceration, but requires additional time to locate appropriate care providers who can provide his mother with the round-the-clock care he now provides.

5. Mr. Morrissey requests an additional sixty (60) days within with to surrender to and including November 28, 2022.

6. On September 8, 2022, I communicated with AUSA Christopher Tortorice who informed me that the government has no objection to this request.

7. Based upon the foregoing, it is respectfully requested that the Court enter an order extending Mr. Morrissey's surrender date to and including November 28, 2022.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 9th day of September at Boston, MA.

Anthony M. Solis /s/

Certificate of Service

On this 9th day of September 2022,, a copy of the foregoing was served upon all parties listed on the Electronic Case Filing (ECF) system.

Dated: September 9, 2022

Respectfully submitted,

Anthony M. Solis,
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