

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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3
4 UNITED STATES OF AMERICA

5 vs.

6 WILLIAM KIT

7 Defendant

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) Docket # 22-CR-00306 (JMC)
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10 **MOTION FOR LEAVE TO LATE-FILE AND**
11 **DEFENDANT’S MEMORANDUM IN AID OF SENTENCING**

12 COMES NOW Mr. William Kit, Defendant, by and through his
13 undersigned Counsel, and respectfully states as follows:

- 14 1. That Counsel had recently come down with the flu, and had to take
15 several days leave while he recuperated.
16 2. Counsel respectfully seeks leave to late-file this Memorandum for
17 medical reasons.
18 3. In the interests of brevity, only a brief Memorandum in Aid of
19 Sentencing is offered in this matter.
20 4. Mr. Kit does not object to the calculations of the Guidelines by the
21 writer of the PreSentence Investigation Report. (Hereinafter
22 referred to as "PSR.")
23 5. He accepted full responsibility in this matter and took an "early"
24 plea before the Court, a brief time after the plea being offered to
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1 him by the prosecution. The plea consisted of two Misdemeanor
2 charges, in this Court and at the Superior Court.

3 6. The American Bar Association has suggested that Judges can show
4 leniency to Defendants who take an early plea and save the Court
5 and the prosecution considerable time and resources.

6 7. Given this acknowledgement, Mr. Kit states that his conduct was an
7 aberration on both occasions, and was prompted by the influence of
8 peers and his emotion simply carried him away on January 6, 2021.
9 Moreover, Mr. Kit runs three small business and carries funds on his
10 person, as a result he had a weapon on his person on July 29, 2022
11 for personal safety.

12 8. Mr. Kit further indicates to the Court that he will engage in lawful
13 conduct in the future, having learnt the error of his ways.

14 9. Mr. Kit requests the Court to sentence him at the low end of the
15 agreement of the parties, to a probationary disposition.

16 10. Mr. William Kit seeks the leniency of the Court.

17 Dated this 24th day of March, 2023.

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19 Respectfully Submitted,

20 *Atiq R. Ahmed*

21 _____
22 Atiq R. Ahmed, Esquire (#390419)
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Counsel for Mr. W. Kit

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of March, 2023 a copy of the foregoing pleading was furnished by the Court's e-filing system to:

Office of the United States Attorney
Attn: J. Hutton Marshall, Esquire

Atiq R. Ahmed

Atiq R. Ahmed, Esquire