UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

vs.

Docket # 22-CR-00306 (JMC)

WILLIAM KIT

Defendant

Defendant

MOTION FOR LEAVE TO LATE-FILE AND DEFENDANT'S SUPPLEMENTAL MEMORANDUM IN AID OF SENTENCING

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

- 1. That Counsel was on leave from April 21, 2023 to May 1, 2023.
- 2. Prior to leaving town Counsel met with Mr. Kit on April 12, 2023. At this meeting it was decided that Mr. Kit draft a personalized response to the prosecution's Memorandum, and submit it to Counsel so it can be filed in a timely manner.
- 3. Regrettably, Counsel received the Supplement during his vacation and was unable to do anything about it. The Supplement is attached to this pleading.
- 4. Counsel respectfully seeks leave of Court to file it late.

5. Mr. Kit requests the Court to sentence him at the low end of the 1 agreement of the parties, to a probationary disposition and seeks 2 the leniency of the Court. 3 4 Dated this 3rd day of May, 2023. 5 Respectfully Submitted, 6 Atiq R. Ahmed 7 8 Atiq R. Ahmed, Esquire (#390419) 601 Pennsylvania Avenue, N.W., 9 South Building, Suite 900 10 Washington D. C. 20004 (202) 710-4929 11 Counsel for Mr. W. Kit 12 13 14 **CERTIFICATE OF SERVICE** 15 I hereby certify that on this 3rd day of May, 2023 a copy of the 16 foregoing pleading was furnished by the Court's e-filing system to: 17 Office of the United States Attorney Attn: J. Hutton Marshall, Esquire 18 Atiq R. Ahmed 19 Atiq R. Ahmed, Esquire 20 21 22 23 24 25