

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

Case No. 1:22-cr-00102-002 (JDB)

JORDAN BONENBERGER,

Defendant.

**UNOPPOSED MOTION TO EXTEND TIME TO LODGE
OBJECTIONS TO INITIAL PRESENTENCE REPORT**

Pursuant to Local Criminal Rule 32.2, defendant Jordan Bonenberger, together with undersigned counsel, respectfully move the Court to extend the time to file objections to the United States Probation Officer's initial presentence investigation report (PSR) in this case from August 15, 2023, until August 22, 2023, or as soon as possible after that date. Although the PSR was filed by the government August 1, 2023, with a normal two-week response date of August 15 under LCrR 32.2 to make any objections, Mr. Bonenberger and his counsel sought as much time as possible to prepare for his required FBI interview in Pittsburgh on August 9 before turning to a thorough review of the 22-page PSR. After the FBI interview was completed on August 9, Mr. Bonenberger and his undersigned lawyer started their review of the PSR. They completed it on August 18 and drafted a two-page letter PSR response; it has been finalized and is ready to be forwarded to the government. Meanwhile, the government's short response to the PSR was filed on time by government counsel by the deadline of August 15.

Mr. Bonenberger has asked the probation officer and government counsel if he could file his PSR response a few days late, and neither objects. His response can be filed immediately.

Sentencing is still scheduled before the Court on September 5 at 3:15 PM.

Accordingly, and for good cause shown, Mr. Bonenberger asks the Court to extend the time to file his objections to the PSR.

Respectfully submitted,

By: /s/ J. Daniel Hull

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 22, 2023, the foregoing Unopposed Motion to Extend Time to Lodge Objections to Initial Presentence Report was filed and served via the Electronic Case Filing (ECF) system.

By: /s/ J. Daniel Hull

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