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2  
3 **IN THE UNITED STATES DISTRICT COURT**  
4 **FOR THE DISTRICT OF COLUMBIA**

5 UNITED STATES OF AMERICA,

Case No. 1-22-cr-00001-JEB

6 v.

7 DANIEL SHAW,  
8

9  
10 **DEFENDANT’S MOTION TO CONTINUE RESPONSE TO MOTION**

11 Defendant Daniel Shaw was sentenced on March 17, 2023 to 10 days’ incarceration and 24  
12 months of supervised release. At sentencing, undersigned counsel objected to the firearm prohibition,  
13 citing the Supreme Court’s decision in *New York State Rifle & Pistol Ass’n, Inc. v. Bruen*, 142 S. Ct.  
14 2111 (2022). The Court accepted counsel’s argument and did not impose the restriction, but invited the  
15 government to brief the issue if it wished. The government filed its motion on March 24, 2023.

16 Pursuant to District of Columbia Local Criminal Rule 47(b), opposing motions must be filed  
17 within 14 days of date of service or at such other time as the Court may direct. Undersigned counsel  
18 has multiple upcoming briefing deadlines and is preparing for trial in another case in the Northern  
19 District of California, and therefore respectfully requests that the response deadline be continued two  
20 extra weeks, to April 21, 2023.

21  
22  
23 March 28, 2023  
Dated

JODI LINKER  
Federal Public Defender  
Northern District of California

24  
25 /S  
26 \_\_\_\_\_  
ELISSE LAROUCHE  
Assistant Federal Public Defender

**[PROPOSED] ORDER**

For the reasons stated in defendant’s motion, the due date for the response to the government’s motion to reinstate the firearm restriction is continued to April 21, 2023.

Dated: \_\_\_\_\_

\_\_\_\_\_  
JAMES E. BOASBERG  
Chief United States District Judge