

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

UNITED STATES OF AMERICA

v.

MICHAEL OLIVERAS,

Defendant.

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Case No.: 21-CR-00738 (BAH)

CONSENT MOTION FOR A TWO DAY EXTENSION

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, with the consent of defendant Michael Oliveras, respectfully requests a two day extension of the deadline for the parties to submit sentencing memorandum. The sentencing memorandum are currently due to the Court on April 10, 2023, and with the extension, the new deadline for the parties to submit sentencing memorandum would be April 12, 2023. Sentencing is scheduled for April 21, 2023.

Good cause exists for this request. As undersigned counsel prepared the sentencing memorandum in this case, we recognized an issue that we would like to clarify prior to sentencing. Specifically, the United States intends to file a Second Superseding Information in this case to ensure that the full language of the statute to which the defendant has already pled guilty is encompassed. We also intend to submit an amended Statement of Offense to reflect that same language and conduct. Undersigned counsel contacted defense counsel when this oversight was uncovered, but defense counsel is out of the office until April 8, 2023. Therefore, the parties have not had an opportunity to resolve this issue to date. To ensure the accuracy and completeness of our sentencing memorandum, we respectfully request a two day extension of the deadline for the parties to submit sentencing memorandum. Undersigned counsel believes this time will permit

parties to confer and, as appropriate, complete the additional paperwork. Undersigned counsel intends to file the proposed amended documents prior to filing our sentencing memorandum. We do not believe this should impact the sentencing date.

Respectfully submitted,

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