

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	Case No.: 1:23-cr-00423-CJN
DANIEL BIBONGE AMSINI,	:	
	:	
Defendant.	:	

**JOINT MOTION TO CONTINUE AND FOR EXTENSION OF TIME
TO FILE SENTENCING MEMORANDA**

Pursuant to this Court’s Order of December 19, 2023, the United States of America, by and through its attorney, the United States Attorney for the District of Columbia and undersigned defense counsel, are to submit a sentencing memorandum. ECF Entry dated 12/19/2023.

Counsel for the defendant is currently in trial in *United States v. Rebecca Lavarenz*, Case No. 1:23-cr-00066 (ZMF). In addition, trial in *United States v. Jared Kastner*, Case No. 1:21-cr-00725 (MAU), has been moved up to April 2, 2024, which involves both of undersigned counsel.

The United States of America, by and through its undersigned counsel, and joined by defendants and their counsel, request that the deadline for submission be extended from April 1, 2024, until May 1, 2024, that the sentencing hearing be reset from April 5, 2024, and that time be excluded under the Speedy Trial Act, 18 U.S.C. § 3161. The parties submit that a continuance is warranted and that an order excluding time would best serve the interests and ends of justice and outweigh the interests of the public and defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). The defendant consents to this joint Submission.

Dated: March 27, 2024

DANIEL B. AMSINI
Defendant

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney

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