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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

AARON ASHCRAFT,

Defendant.

CASE NO. 2:22-CR-00087-KJM

GOVERNMENT'S MOTION FOR AN
EXTENSION OF TIME

The United States of America, by and through its counsel, Phillip A. Talbert, United States Attorney, and Matthew Thuesen, Assistant United States Attorney, hereby requests an extension to April 17, 2024, in which to file its response or opposition to the defendant's *pro se* motion for reconsideration of the denial of compassionate release pursuant to 18 U.S.C. § 3582(c)(1)(A). Docket No. 46. This motion is based on the attached declaration of Assistant United States Attorney Matthew Thuesen.

Dated: March 27, 2024

PHILLIP A. TALBERT
United States Attorney

By: /s/ Matthew Thuesen
MATTHEW THUESEN
Assistant United States Attorney

DECLARATION

I, Matthew Thuesen, declare as follows:

1. I am an Assistant United States Attorney for the Eastern District of California and am familiar with the facts described below.

2. On March 19, 2024, the defendant filed a *pro se* motion for reconsideration of the denial of his compassionate release motion. The motion was docketed on March 20, 2024. Docket No. 46. Pursuant to Local Rule, the government's response is due on March 27, 2024.

3. I am aware personnel from the office of the undersigned have requested necessary updated documents from the Bureau of Prisons pertaining to Ashcraft. Those records have not yet been received. Since the enactment of the First Step Act, document requests take longer to receive than they previously did. Undersigned counsel also needs additional time to fully evaluate the records Ashcraft attached to his motion for reconsideration. Additionally, undersigned counsel has leave scheduled.

4. For the reasons stated above, the government asks this Court for an extension to April 17, 2024, to file its response to Ashcraft's *pro se* motion. This will allow time to analyze the relevant documents, review the law governing this case, and draft an appropriate response.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 27th day of March 2024.

/s/ Matthew Thuesen

MATTHEW THUESEN

Assistant United States Attorney

CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that he/she is an employee in the Office of the United States Attorney for the Eastern District of California and is a person of such age and discretion to be competent to serve papers.

That on March 27, 2024, a copy of the GOVERNMENT'S MOTION FOR AN EXTENSION OF TIME and PROPOSED ORDER was served by placing said copy in a postpaid envelope addressed to the person(s) hereinafter named, at the place(s) and address(es) stated below, which is/are the last known address(es), and by depositing said envelope and contents in the United States Mail at Sacramento,

California. Addressee:

Aaron Ashcraft
#00025-510
FCI-SHERIDAN
P.O. Box 6000
Sheridan, OR 97378

/s/ C. Buxbaum
C. BUXBAUM