

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	20CR00922
v.	)	
	)	
	)	
CARLOS SMITH	)	

MOTION TO EXTEND TIME FOR SELF-SURRENDER

Defendant, CARLOS SMITH, through his attorney, Bedi & Singer, LLP, respectfully requests that this Court extend the time for self-surrender until June 5, 2023. In support, Defendant, states as follows:

1. On June 22, 2023 Mr. Smith pled guilty.
2. On February 23, 2023, Mr. Smith was sentenced to 48 months BOP. (Dkt. 57).
3. Mr. Smith was ordered to self-surrender to the Bureau of Prisons: before 2:00 pm on 4/25/2023 (Dkt. 59).
4. On April 10, 2023, Mr. Smith filed a motion to extend his self surrender date in order for his family to make arrangements to care for Mr. Smith's mother. (Dkt. 61). The court granted this motion and extended his self-surrender date to June 5, 2023. (Dkt. 62).
5. Mr. Smith's brother, Julius Smith, is moving to Forest Park, Illinois to be closer to Mr. Smith's mother in order to take care of her while Mr. Smith is incarcerated. His brother's move has been delayed due to his brother's recent hospitalization. (Ex. 1).
6. Mr. Smith requests his self-surrender date be continued to July 6, 2023,¹ in order to continue to take care of his mother until his brother can take over.

¹ As of the date of this filing Mr. Smith has not been made aware of his designation.

7. The undersigned counsel has conferred with the government who objects to this request.

Wherefore, it is respectfully requested the Court extend the time for self-surrender until July 6, 2023.

By: s/ Dena M. Singer

Dena M. Singer
Bedi & Singer, LLP
53 West Jackson Blvd, Suite 1505
Chicago, IL 60604
Phone: (312) 525-2017
dsinger@bedisinger.com
Attorney for Defendant

Certificate of Service

I, Dena M. Singer, hereby certify I caused a copy of the foregoing Motion to be served on upon the Assistant United States Attorney by causing it to be electronically filed with the Clerk of the Court using the CM/ECF system.

/s/ Dena M. Singer
Dena M. Singer