

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

UNITED STATES OF AMERICA

v.

JENNIFER MAY,

Defendant.

Case No. 25-CR-211 (CRC)

**GOVERNMENT'S MOTION TO CONTINUE DEADLINE FOR MEMORANDA IN AID
OF SENTENCING**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, hereby respectfully moves to continue the deadline for the parties to file memoranda in aid of sentencing in the above-captioned matter. In support of its motion, the government states as follows:

1. On August 27, 2025, Defendant Jennifer May (hereinafter, "the Defendant"), entered a plea of guilty to one count of Wire Fraud in violation of 18 U.S.C. § 1343.
2. The Court set the Defendant's sentencing for December 9, 2025. As part of the Court's order, the Court also required that the parties submit any memoranda in aid of sentencing by no later than December 2, 2025.
3. The United States would ask that the deadline be extended by 48 hours so that memoranda are due by no later than December 4, 2025. Due to a calendaring oversight by undersigned counsel, the government did not realize until November 24, 2025 that the Court's deadline conflicted with pre-planned, international travel in which undersigned counsel will not have access to government-furnished devices authorized to be taken outside of the United States, and thus will be unable to complete the sentencing memoranda by the Court's deadline.

4. Undersigned counsel attempted to contact counsel for the Defendant on November 24, 2025 and November 25, 2025, but was unable to do so and thus does not know the position of the Defendant on the government's motion.

WHEREFORE, the government respectfully requests that the deadline within which to submit memoranda in aid of sentencing is extended to December 4, 2025.

Respectfully submitted,

JEANINE FERRIS PIRRO
UNITED STATES ATTORNEY



WILL HART
Assistant United States Attorney
U.S. Attorney's Office for the
District of Columbia
D.C. Bar No. 1029325
601 D. St., N.W.,
Washington, D.C. 20530
William.hart@usdoj.gov
(202)-252-7877