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

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| **UNITED STATES OF AMERICA,** | * | |
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| **v.** | * | |
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| | * | **Docket No.: 1:25-CR-00270-RDB** |
| | * | |
| **EDWARD MCCORKLE.** | * | |

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**MOTION TO DELAY SURRENDER DATE**

Edward McCorkle, through his attorney, Matthew Zernhelt, respectfully requests that this Honorable Court delay his surrender date by 60 days. In support of this Motion, the Defendant states the following:

1. Mr. McCorkle entered a plea of guilty before this Court on September 15, 2025, to one count of conspiracy to commit wire fraud in violation of 18 U.S.C. §1349 and §1343. Mr. McCorkle's guilty plea was tendered pursuant to an agreement under the Federal Rules of Criminal Procedure 11(c)(1)(B).

2. Mr. McCorkle is set to be sentenced by this Court on January 27, 2026. He is facing sentencing guidelines of 30 to 37 months.

3. Mr. McCorkle has remained in the community during pretrial proceedings. He was released on his own recognizance, with Pretrial Services supervision, on September 15, 2025. Mr. McCorkle has not violated any of the terms of his supervision.

4. Mr. McCorkle requests additional time to get his affairs in order before his incarceration. Mr. McCorkle watches his 4-year-old daughter and 6-year-old son daily as

Mr. McCorkle's partner works. Mr. McCorkle drives the children to and from school and to their activities outside of school. Mr. McCorkle and his partner are working to find stable and reliable daycare to replace Mr. McCorkle's care.

WHEREFORE, the Defendant prays this Honorable Court sign the attached Order granting his request to delay his surrender date until March 28, 2026.

Respectfully submitted,

_____/s/_____
Matthew Zernhelt
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**CERTIFICATE OF SERVICE**

I hereby certify that on the date of filing this motion, a copy of the foregoing was served electronically by ECF to: Office of the United States Attorney.

_____/s/_____
Matthew Zernhelt