UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:23-CR-0094-D-1

UNITED STATES OF AMERICA v. DONTRELL BARNES	UNOPPOSED MOTION TO EXTEND THE PSR OBJECTIONS DEADLINE AND CONTINUE SENTENCING

The defendant, Dontrell Barnes, by and through counsel, respectfully moves this Honorable Court to extend the Objections to the draft presentence report deadline for and additional twenty (21) days until September 18, 2023, and to continue the sentencing hearing currently scheduled for August 28, 2023, term accordingly or to a date that the Court deems appropriate. The following is offered in support of this request:

1. Mr. Barnes was named in a criminal complaint filed on March 23, 2023, alleging Conspiracy to Commit Wire Fraud, in violation of 18 U.S. Code § 1349.
2. The Office of the Federal Public Defender was appointed to represent Mr. Barnes on November 22, 2022. Defense counsel entered his Notice of Appearance on November 29. 2022.
3. On May 24, 2023, Mr. Barnes waived his right to prosecution by indictment and consented to prosecution by criminal information. Mr. Barnes pled guilty pursuant to a plea agreement to one (1) count of Conspiracy to Commit Wire Fraud.
4. Response of Objections to the draft PSR presently are due no later than July 10, 2023. The sentencing hearing for this matter is currently set for the August 28, 2023, term in Raleigh North Carolina.

5. Mr. Barnes is currently out of custody on conditions of release agreed upon by both parties at his Plea hearing.
6. Undersigned counsel conferred with counsel for the government, Assistant United States Attorney David G. Beraka, and both sides believe that a twenty-one (21) day extension of the PSR response deadline and as well as a continuance of the sentencing hearing.
7. Undersigned counsel seeks additional time to meet with Mr. Barnes to review the Draft PSR and to prepare for the hearing. Moreover, undersigned counsel expects to be taking a period of family medical leave beginning during the week of July 10, 2023.
8. This Motion is made in good faith and not for the purposes of delay. Neither the Government nor the Defendant would be prejudiced by the extension and continuance sought herein.

WHEREFORE, the Defendant respectfully requests that the deadline for filing Response to the Objections of Draft PSR be extended for at least twenty-one (21) days, through and including September 18, 2023, and that the sentencing in this matter be continued accordingly to a date that the Court deems appropriate. The ends of justice served by this Motion outweigh the interests of the public and the Defendant in a speedy trial as set forth in 18 U.S.C. § 3161(h)(7)(A).

Respectfully requested this 7th day of July 2023.

G. ALAN DuBOIS
Federal Public Defender

/s/ Jean-Paul E. Jacquet-Freese
JEAN-PAUL E. JACQUET-FREESE
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LR 57.1 Counsel Appointed

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon:

David G. Beraka
United States Attorney's Office
150 Fayetteville St, Suite 2100
Raleigh, NC 27601
919-856-4871
Email: david.beraka@usdoj.gov

by electronically filing the foregoing with the Clerk of Court on this date, using the CM/ECF system which will send notification of such filing to the above, and on

This the 7th day of July 2023.

/s/ Jean-Paul E. Jacquet-Freese
JEAN-PAUL E. JACQUET-FREESE
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