UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
	:	
v.	:	**No. 21-CR-284 (JDB)**
	:	
	:	**Sentencing Dec. 3, 2021**
JAMES BELL	:	
Defendant.	:	
	:	

MOTION TO EXTEND DEADLINE TO FILE SENTENCING MEMORANDA

James Bell through counsel, respectfully moves this Court to extend the deadline for filing his Sentencing Memoranda by twenty-four hours, from November 23, 2021, to November 24, 2021.

In support of the motion counsel states the following:

1. Counsel received the final[1] pre-sentence report on November 23, 2021, the same date that Mr. Bell's sentencing memorandum is due.
2. The government has not yet filed its' sentencing memoranda, and Mr. Bell would request an opportunity to respond to the Small Business Administration's statement of restitution, *see* PSR ¶65, and arguments made by the government, in his initial sentencing submission.
3. There is no prejudice to the government by enlarging the time for Mr. Bell to submit his sentencing submission by 24 hours.

WHEREFORE, Mr. Bell respectfully requests that this Court grant his Motion to Extend Deadline to File Sentencing Memoranda.

[1] Counsel received the draft PSR on September 1, 2021.

Respectfully submitted,

/s/ Brandi Harden

Brandi Harden
Bar No. 470706
Counsel for James Kyle Bell
Harden|Pinckney, PLLC
400 7th Street Suite 604
Washington, DC 20004
bharden@hardenpinckney.com

CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2021, I caused a copy of the foregoing motion to be served on counsel of record via ECF.

/s/ Brandi Harden

Brandi Harden, Esq.