UNITED STATES DISTRICT COURT DISTRICT OF MAINE

UNITED STATES OF AMERICA)
)
VS.)
)
K'SHAWN BROOKS,)
DEFENDANT)

Docket No. 2:21-CR-00164

UNOPPOSED MOTION TO ENLARGE SENTENCING MEMORANDUM PAGE-LIMIT

NOW COMES K'Shawn Brooks, by and through undersigned counsel, and moves this Honorable Court to enlarge the page limit set forth in D. Me. Local R. 147(d) for his Sentencing Memorandum. In support of this Motion, Mr. Brooks states as follows:

- (1) Mr. Brooks is currently before this Court for Sentencing scheduled July 13, 2023.
- (2) Pursuant to D. Me Local R. 147(d), dispositive Motions cannot have a length of greater than twenty pages without leave from the Court. While it may be argued that a Sentencing Memorandum is not a dispositive Motion, it is in support of negating any upward variance or departure, thus it is a memorandum of law in support of a specific position.
- (3) K'Shawn Brooks, without objection, respectfully requests the Court to grant this Motion to permit him to file his Sentencing Memorandum in excess of the twentypage limit.

Dated this 6th of July 2023 at Portland, Maine.

Respectfully submitted,

<u>s/David J. Bobrow, Esq.</u>

David J. Bobrow, Esq. Attorney for Joshua Frances BEDARD AND BOBROW, PC 9 Bradstreet Lane P.O. Box 366 Eliot, ME 03903 207.439.4502 djblaw@bedardbobrow.com

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I, David J. Bobrow, Esq., hereby certify that I have caused to be served via ECF K'Shawn Brooks' Motion to Exceed Page Limit on the following individuals:

- 1. Green, Sean (USAME) <u>Sean.Green2@usdoj.gov;</u>
- 2. All other attorneys of record in this matter.

Dated this 6th of July 2023 at Portland, Maine.

Respectfully submitted,

s/David J. Bobrow, Esq.

David J. Bobrow, Esq. Attorney for K'Shawn Brooks BEDARD AND BOBROW, PC 9 Bradstreet Lane P.O. Box 366 Eliot, ME 03903 207.439.4502 djblaw@bedardbobrow.com