

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

|                                 |   |                                 |
|---------------------------------|---|---------------------------------|
| <b>UNITED STATES OF AMERICA</b> | ) |                                 |
|                                 | ) |                                 |
| <b>v.</b>                       | ) | <b>Case No. 23-cr-427 (DLF)</b> |
|                                 | ) | <b>24-cr-238 (DLF)</b>          |
| <b>DAN EDWIN WILSON,</b>        | ) |                                 |
| <b>Defendant</b>                | ) |                                 |
| _____ /                         | ) |                                 |

**DEFENDANT WILSON’S UNOPPOSED MOTION TO EXTEND  
SURRENDER DATE**

The Defendant, **DAN EDWIN WILSON**, by and through undersigned counsel, moves this Honorable Court to enter its order extending his surrender date, and as grounds therefore states the following:

1. The Defendant is currently scheduled to surrender on Thursday, February 27, 2025, no later than 2 P.M.
2. Upon counsel’s request, the government has agreed to take another look at the defendant’s legal situation, and in the hopes of averting further litigation through appeal and/or collateral attack, wish to reach a resolution that would achieve that goal. The government and undersigned counsel submit that thirty (30) days would be sufficient to accomplish such a final resolution.
3. Prior to filing this motion, undersigned counsel contacted Jennifer

Blackwell, counsel for the government, and is authorized to represent to the Court that the government has no opposition to this motion.

4. This motion is being made in good faith and is not interposed for the purposes of unnecessary delay.

WHEREFORE, the Defendant respectfully requests that this Honorable Court grant the relief requested herein and enter its order extending his surrender date thirty (30) days.

Respectfully submitted,

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By:/s/ George T. Pallas  
GEORGE T. PALLAS, ESQ.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been electronically filed with the Clerk of Court using CM/ECF system which will send notification of such filing.

By:/s/ George T. Pallas  
GEORGE T. PALLAS, ESQ