

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

UNITED STATES OF AMERICA,)	
)	
v.)	No. 21-362 (APM)
Andrew Michael Cavanaugh)	
)	
Defendant.)	
_____)	

UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

Undersigned counsel respectfully requests that the Court grant a brief continuance of the sentencing hearing currently scheduled for July 14, 2022. In support, counsel submits as follows:

1. Mr. Cavanaugh is scheduled to appear before the Court on July 14, 2022 to be sentenced for a violation of 40 U.S.C. §5104 (e)(2)(G) for his conduct on January 6, 2021.
2. Undersigned counsel noticed her appearance on June 14, 2022, as prior counsel has left the office and will no longer be representing Mr. Cavanaugh.
3. Unfortunately, undersigned counsel has a jury trial scheduled for July 11, 2022, and will not be available on July 14, 2022 for sentencing in this matter.
4. Undersigned counsel requests that the Court grant a brief continuance to accommodate defense counsel’s schedule.
5. The parties have conferred and request a date in the first week of August.¹

¹ The parties are available August 1, August 2 in the afternoon, August 3-5 in the morning. If the court does not availability in the first week of August, the parties are also available on August 8 and 12.

WHEREFORE, undersigned counsel asks that this Honorable Court to grant a brief continuance of the Sentencing Hearing currently scheduled for July 14, 2022.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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