

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
WASHINGTON, D.C.

UNITED STATES OF AMERICA)
) No. 1:21-00267
) JUDGE CHRISTOPHER R. COOPER
)
v.)
)
BRYAN WAYNE IVEY)

JOINT MOTION TO CONTINUE SENTENCING HEARING

The parties, as evidenced by the signature of counsel below, hereby jointly move this Honorable Court for an order continuing the sentencing hearing that is presently set in this case on September 28, 2021 at 11:00 a.m. The parties request that this Court continue the sentencing hearing for at least sixty (60) days.

A continuance is necessary because counsel for Mr. Ivey is completing an investigation into certain mitigating evidence that will be relevant to this Court's determination of the appropriate sentence. Counsel has been diligently investigating this information but the investigation is not yet complete. Defense counsel needs additional time in order to complete his investigation and provide the mitigating evidence to the government and to the United States Probation Office so it can be included in the Presentence Report prior to sentencing. Defense counsel needs at least sixty additional days in order complete the investigation and preparation of the mitigating evidence in order to provide effective assistance of counsel to Mr. Ivey at sentencing.

Wherefore, the parties respectfully request this Court continue the sentencing hearing for a period of at least sixty days.

Respectfully submitted,

s/ R. David Baker

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2021, I electronically filed the foregoing *Joint Motion to Continue Sentencing Hearing* with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Leslie A. Goemaat, Assistant United States Attorney, 555 4th St. N.W., Room 5840, Washington, D.C., 20530; and to Robert Walters, United States Probation Officer, 333 Constitution Avenue, N.W., Room 2214, Washington, D.C.

s/ R. David Baker

R. DAVID BAKER