



Therefore, counsel also requests a delay of one week until July 19, 2023, for the deadline for filing Defendant's and Government's Sentencing Memoranda to ensure that counsel will likely be able to consult with the Defendant on the content of the Sentencing Memorandum in that time.

**CONCLUSION**

ACCORDINGLY, for all the reasons described above, Alberts respectfully moves for rescheduling of the in-person sentencing hearing. Counsel will submit medical documentation under seal as soon as received from the Defendant. Defendant by counsel also moves for a one-week extension until July 12, 2023, to submit a Sentencing Memorandum.

Dated: July 10, 2023

RESPECTFULLY SUBMITTED

**CHRISTOPHER MICHAEL ALBERTS**

*By Counsel*



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**CERTIFICATE OF SERVICE**

I hereby certify that this document is being filed on this July 10, 2023, with the Clerk of the Court by using the U.S. District Court for the District of Columbia's CM/ECF system, which will send an electronic copy of to the following CM/ECF participants.

\_\_\_\_\_/s/\_\_\_\_\_  
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John M. Pierce, Esq.