

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

UNITED STATES OF AMERICA,

v.

DANEAN KIMBERLY MACANDREW,

Defendant.

Criminal No. 21-cr-00730 (CKK)

JOINT MOTION TO CONTINUE SENTENCING DATE

Defendant Danean Kimberly MacAndrew, by and through her counsel Deputy Federal Public Defender Lillian Chu, and Plaintiff United States of America, by and through Assistant United States Attorneys Zachary Phillips and Julie Bessler, move this Court for an approximately 90-day continuance of Ms. MacAndrew's sentencing hearing, currently scheduled for May 24, 2023. The parties hereby stipulate and agree that:

1. On January 17, 2023, Ms. MacAndrew was convicted by bench trial on the four misdemeanor counts in the Information. Ms. MacAndrew's sentencing is currently scheduled for May 24, 2023, at 2:00 p.m.

2. The defense requests additional time to investigate mitigation evidence, obtain records, and prepare sentencing arguments. The defense seeks a continuation of approximately 90 days. The government does not oppose this request.

3. The parties requests the current sentencing date be continued to a convenient date for the Court and the parties in August 2023. The government is available prior to August 22, 2023. The defense is available any date August 8 through 11, and August 14 through 18.

For these reasons, the parties hereby move and stipulate that the Court should continue Ms. MacAndrew's sentencing date from May 24, 2023, at 2:00 p.m. to a date convenient in August 2023. The parties further request and stipulate that the Court should order all sentencing deadlines to be counted from the new sentencing date.

Respectfully submitted,

DATED: April 21, 2023

/s/ Lillian Chu

LILLIAN CHU
Deputy Federal Public Defender
(Cal. Bar No. 279095)
(E-Mail: Lillian_Chu@fd.org)
Office of the Federal Public Defender, C.D. Cal
321 East Second Street
Los Angeles, California, 90012
Telephone: (213) 894-5383
Facsimile: (213) 894-0081

DATED: April 21, 2023

/s/ with authorization via email

ZACHARY PHILLIPS
JULIE BESSLER
Assistant United States Attorneys