

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

JAMES RUSSELL DAVIS

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Case No. 21-cr-595 (TJK)

**DEFENDANT’S UNOPPOSED
MOTION TO CONTINUE SENTENCING**

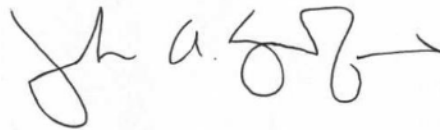
COMES NOW, James Russell Davis, by and through counsel, and hereby moves this Court to continue the September 19, 2023 Sentencing in this matter. In support of his motion, undersigned states as follows:

1. This matter is currently scheduled for a sentencing date on September 19, 2023.
2. The defense is requesting a continued sentencing date for late October for two primary reasons. First, two attorneys have unexpectedly resigned from undersigned counsel’s firm’s Maryland office in the last 45 days. This has caused a tremendous strain on undersigned’s schedule and made it impossible to timely schedule a presentence report interview.
3. In addition, the defendant has experienced significant recent health problems including hospitalization that have further prevented a timely scheduling of the presentence report interview.
4. Defense counsel has spoken with counsel for the government who indicated that the government does not oppose moving sentencing to late-October to provide extra time to complete the interview.

5. Accordingly, the defense respectfully asks the Court to amend the sentencing schedule to move sentencing to any day between October 20, 2023, and October 31, 2023. If these dates are not available for the Court, the parties can provide additional dates upon request.
6. In addition, the defense requests to move the deadline for the government's sentencing memorandum to from September 5, 2023 to October 5, 2023 and the defense memorandum from September 12, 2023 to October 12, 2023 and any reply from September 12, 2023 to October 17, 2023 or any dates on around that time frame.

WHEREFORE, for the following reasons and any other reasons the Court deems appropriate, the defense respectfully requests a continued sentencing schedule as described herein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J.A. Scrofano", with a horizontal line extending to the right from the end of the signature.

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