

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

UNITED STATES OF AMERICA,

v.

JON THOMAS MOTT,

Defendant.

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) **Case No. 21-CR-00464 (RCL)**
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**UNOPPOSED MOTION FOR VTC SENTENCING HEARING AND NOTICE OF
PROBABLE MOTION TO CONTINUE HEARING**

COMES NOW Defendant (Mr. Mott), by and through undersigned counsel, and respectfully tenders his unopposed motion for VTC Sentencing Hearing pursuant to Fed R. Crim. P. 43(b)(2) and notice of probable motion to continue hearing and in support thereof states as follows:

1. On November 30th, 2022, this Court set this matter of Sentencing.
2. The minute entry from that date states that the parties are to appear in person for said hearing.
3. If it please the Court, Mr. Mott would request this Hearing to take place via virtual teleconferencing pursuant to Fed R. Crim. P. 43(b)(2) as the offense for which he will be sentenced is a misdemeanor.
4. Counsel for the Government has been consulted and has no objection to Mr. Mott's motion.

5. Further, in consulting with Counsel for the Government on this matter, it was advised that the Government's Sentencing Memorandum is expected to be lengthy and will, in all probability, not be filed in this case until after the 27th of February 2023.
6. While Mr. Mott is hopeful that there will be sufficient time wherein to respond to the Government's Sentencing Memorandum and file a Sentencing Memorandum of his own so as to keep the current date set for hearing, it is likely that there will not be sufficient time to do so.
7. Therefore, Mr. Mott wishes to provide notice to this Court, so as not to cause undue vexation, that an unopposed motion to continue the Sentencing Hearing in this matter is likely.

WHEREFORE Defendant respectfully prays this Court make and enter its Order setting the Sentencing Hearing in this matter for a VTC in keeping with Fed. R. Crim. P. 43(b)(2); take notice that due to time constraints presented by the pending filing of the Sentencing Memorandum on the part of the Government, an unopposed motion to continue is likely; and for such other and further relief as this Court shall deem just and proper on the premise.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of February 2023, I filed the foregoing Unopposed Motion for VTC Sentencing Hearing and a proposed Order by the Court's CM/ECF system. All case registered parties will be served by CM/ECF.

A handwritten signature in black ink that reads "Gallen". The signature is written in a cursive style with a large, sweeping initial 'G'.

Joseph W. Allen