

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
vs.)	Case No. 1:21-cr-00645-DLF
)	
KEVIN DOUGLAS CREEK,)	
)	
Defendant.)	

JOINT MOTION FOR CONTINUANCE

COMES NOW defendant by and through Counsel Troy B. Jones of the Law Office of Troy B. Jones and moves the Court for a continuance of the Sentencing Hearing scheduled for March10, 2022 in accordance with the Legal Suggestions attached hereto:

LEGAL SUGGESTIONS

1. This cause is currently set for Sentencing Hearing on March10, 2022.
2. Counsel spoke with AUSA Jacob Strain who does not object to this continuance. We have discussed the length of time for the continuance and have suggested to the Court a date after August 2022.
3. Counsel is in the process of obtaining and reviewing the Presentencing Questionnaire and Financial Form.
4. Counsel is dealing with several trials in the coming months and taking the Florida Bar Exam.
5. The parties also agree that, should any of the above-referenced proposed dates be inconvenient or acceptable for any reason, the Court has the discretion to set other dates which are more convenient or acceptable. However, counsel request that, in any event, the current proposed dates in this matter be continued to a time that is at least after the end of August 2022.

WHEREFORE, counsel prays for an order herein that the Sentencing Hearing herein be continued and for such other and further relief as the Court deems just and proper.

Respectfully Submitted

/s/ Troy B. Jones

TROY B. JONES, TN Bar #033064

Attorney for Defendant

LAW OFFICE OF TROY B. JONES

418 S. Gay Street, Suite 204

P.O. Box 2308

Knoxville, Tennessee 37901

PH: (865) 456-5901

Fax: (865) 262-8855

Gregory Brown, Esq.

LOWE YEAGER & BROWN PLLC

900 South Gay Street

Suite 2102

Knoxville, Tennessee 37902

PH: (865) 521-6527

gb@lyblaw.net

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to U. S. Attorneys, Salt Lake City, UT.

/s/ Troy B. Jones

TROY B. JONES