

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

UNITED STATES OF AMERICA :
 : **Case No. 1:21-cr-356 (EGS)**
 v. :
 :
KEVIN SAM BLAKELY, :
 :
 Defendant. :

MOTION FOR CONTINUANCE OF SENTENCING HEARING

The United States through its attorneys, Matthew Graves, United States Attorney for the District of Columbia, and Anita Eve, Assistant United States Attorney, and defendant Kevin Sam Blakely, , through his counsel, William Cox, hereby respectfully move the Court for a continuance of the sentencing hearing scheduled in the above-captioned matters on March 24, 2022. In support of this Motion, the parties represent as follows:

1. As this Court is aware, the sentencing hearing in this matter is scheduled to commence on March 24, 2022 at 2:00 p.m. EST and the date of for the filing of the sentencing memoranda is March 1, 2022.

2. This is the first motion for continuance of the sentencing hearing filed by the government and the defendant.

3. The government has found herself with familial issues and in order to maintain continuity of counsel this request for delay is necessary. Also, there are issues pertaining to the government's recommended sentence for the defendant which must be addressed. Both counsel for the government and the defendant will require the additional time requested to review the unresolved issue.

4. Counsel for the government has conferred with counsel for the defendant and there is no objection to this request for a continuance of the date for the filing of the respective sentencing memorandum and the sentencing hearing.

5. Wherefore, the parties respectfully request at least a 30-day continuance of the date for the filing of the parties' sentencing memoranda and sentencing hearing in this matter.

Respectfully submitted,

MATTHEW GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Anita Eve
Anita Eve
Assistant United States Attorney, Detailee
PA Bar No. 45519

CERTIFICATE OF SERVICE

On this 1st day of March 2022, a copy of the foregoing was served upon all parties listed on the Electronic Case Filing (ECF) System.

/s/ Anita Eve
Anita Eve
Assistant United States Attorney