

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

PHILIP EDWARD KRAMER
Defendant.

Case No. 1:21-CR-00413-EGS

UNOPPOSED MOTION TO CONTINUE DATE TO FILE DEFENSE SENTENCING

MEMORANDUM

Defendant Philip Edward Kramer, by and through his attorney of record, Deputy Federal Public Defender Jonathan Ogata, hereby respectfully moves for a continuance of the date to file the Defense Sentencing Memorandum from May 2, 2022, to May 9, 2022.

1. On March 16, 2022, the government filed an unopposed motion to continue Mr. Kramer's sentencing.

2. On March 18, 2022, this Court granted the government's motion and continued Mr. Kramer's sentencing from April 7, 2022, to May 12, 2022, at 1:00 p.m. ET, ordering the government to file their sentencing memorandum no later than April 18, 2022, and the defendant to file his sentencing memorandum no later than May 2, 2022.

3. The government filed their sentencing memorandum on April 19, 2022.

4. Defense Counsel was on medical leave from April 19 through April 25, 2022, due to COVID-19, and Defense Counsel remains on quarantine until this Friday, April 29, 2022, with limited ability to meet with Mr. Kramer and engage in any mitigation interviews or investigation that may be required. Defense Counsel thus, requires additional time to prepare Mr. Kramer's sentencing memorandum

5. Defense Counsel has conferred with the government, by and through Assistant United States Attorney Anita Eve, and there is no objection to this request for a continuance.

6. Wherefore, the defense respectfully requests a continuance of the date to file Mr. Kramer's sentencing memorandum from May 2, 2022, to May 9, 2022, and for the sentencing hearing to either remain on May 12, 2022, or to be rescheduled to a date most convenient for the Court.

Respectfully submitted,

CUAUHTEMOC ORTEGA
Federal Public Defender

DATED: April 27, 2022

By */s/ Jonathan K. Ogata*

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