

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

**UNITED STATES OF AMERICA** :  
 :  
 v. : **Case No. 21-cr-580 (DLF)**  
 :  
**ROBERT BALLESTEROS** :  
 :  
 **Defendant.** :

**MOTION TO CONTINUE SENTENCING HEARING AND  
VACATE SENTENCING RELATED DEADLINES**

The United States of America and defendant jointly move this Court to continue the sentencing hearing currently scheduled for January 27, 2022 and move this Court to vacate the deadlines for the government and counsel for defendant to file sentencing memorandums.

Counsel for the government and counsel for defendant have recently been assigned to handle this matter. As such, both parties can benefit from additional time to address sentencing related issues prior to filing sentencing memorandums. The government’s deadline for filing its sentencing memorandum is January 20, 2022, while the defendant’s brief is due January 24, 2022. Counsel for the defendant and the government have conferred. Counsel for defendant has no objection to this request. The parties are united in their belief that the jointly request continuance will strongly facilitate their preparedness and the effectiveness of all counsel.

**CONCLUSION**

For the foregoing reasons the parties respectfully request that the Court grant the request to vacate the sentencing date currently set for January 27, 2022, grant a 30-day continuance of the above-captioned proceeding, and set a new submission deadline for the government's and defendant's sentencing memoranda to be filed.

Respectfully submitted,

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