

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-245 (APM)
	:	
SHANE JENKINS,	:	
	:	
Defendant.	:	

**DEFENDANT SHANE JENKINS’
MOTION TO CONTINUE SENTENCING HEARING**

Defendant Shane Jenkins (“Mr. Jenkins”), by and through undersigned counsel, respectfully requests that this Honorable Court continue Mr. Jenkins’ sentencing hearing currently scheduled for July 28, 2023, to a date convenient to the Court in sixty (60) to ninety (90) days. Furthermore, Mr. Jenkins respectfully requests that this Honorable Court continue the deadline for submission of sentencing memoranda currently scheduled for July 19, 2023, as well as continue the deadline for the submission of the Presentence Investigation Report currently scheduled for July 12, 2023, accordingly. In support of his motion, Mr. Jenkins states as follows:

1. Undersigned counsel hereby expresses the necessity for an extension of time in order to thoroughly research matters related to Mr. Jenkins’ sentencing, particularly pertaining to mental health factors.
2. Furthermore, undersigned counsel is scheduled to be in a complex trial in the U.S. District Court for the District of Columbia starting in August of 2023. This particular case entails the collaboration of co-counsel hailing from many different jurisdictions, thereby creating a heightened level of difficulty when it comes to scheduling matters. Specifically, the date of

July 28, 2023, stands as the sole instance during which all co-counsel shall be available to convene and discuss the impending trial.

3. Counsel for the government, Assistant United States Attorney David J. Perri and Assistant United States Attorney Holly F. Grosshans, have been notified of this request. Counsel for the government advised that the government does not oppose the requested continuance.

WHEREFORE, Defendant Shane Jenkins respectfully requests that this Honorable Court grant his motion and continue the sentencing hearing currently scheduled for July 28, 2023, until a date most convenient to the Court in sixty (60) to ninety (90) days, as well as continue the deadline for submission of sentencing memoranda currently scheduled for July 19, 2023, and the Presentence Investigation Report due July 12, 2023.

Respectfully Submitted,

/s/ Dennis E. Boyle
Dennis E. Boyle
Blerina Jasari
Boyle & Jasari
1050 Connecticut Ave, NW
Suite 500
Washington, DC 20036
dboyle@dennisboylelegal.com
bjasari@dennisboylelegal.com
Telephone: (202) 430-1900

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of June 2023, I electronically filed the foregoing with the Court using the CM/ECF system, which sent notification of such filing to all parties.

/s/ Dennis E. Boyle

Dennis E. Boyle