

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 21-CR-91 (RCL)**
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 ISAAC STURGEON :

UNOPPOSED MOTION TO CONTINUE SENTENCING

Isaac Sturgeon, through undersigned counsel, respectfully requests that this Court grant his request for an approximately 45 day continuance of the currently scheduled sentencing hearing set for August 25, 2023. In support of this motion, counsel states as follows:

1. Isaac Sturgeon and Craig Bingert were convicted of all charges contained in the superseding indictment after a bench trial on May 24, 2023. On that day, the parties selected a sentencing date of August 25, 2023.
2. In the interim, the government has submitted to probation an in depth memorandum asserting its arguments, that if adopted by probation, would result in an unprecedented estimated guideline range of 135 to 168 months' imprisonment.
3. The parties have requested the trial transcripts, which counsel has not yet received but should be available soon. These transcripts are necessary for defense counsel to (1) rebut the government's arguments with respect to the appropriate guideline range, and (2) to adequately prepare for sentencing. Defense counsel is planning on submitting a response memorandum to probation stating its position on the estimated sentencing guidelines. Given the upcoming deadlines probation has to meet with respect to its draft report, counsel needs more time to review the trial transcripts and submit a response to

the government's lengthy probation memorandum prior to probation's draft report deadlines.

4. In addition, counsel for Mr. Bingert has advised that he has a personal conflict that has arisen with the currently scheduled date of August 25, 2023.¹
5. Undersigned counsel has discussed this request with government counsel, who have no opposition to a 30-45 day continuance.
6. Lastly, Mr. Sturgeon has been in full compliance with his release conditions and consents to this request for a continuance.

For these reasons, Mr. Sturgeon, through counsel, respectfully requests that the Court grant a 45 day continuance to allow counsel to obtain and review the trial transcripts, and adequately respond to the government's probation memorandum regarding the sentencing guidelines, as well as to adequately prepare for sentencing.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

 /s/
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¹ Counsel for Mr. Bingert has also advised that he is unavailable for two weeks in October beginning on October 9, 2023, through October 20, 2023.