

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

UNITED STATES OF AMERICA)	
)	
v.)	
)	Nos.
GRAYDON YOUNG,)	1:21-cr-28-6 (APM)
JASON DOLAN,)	1:21-cr-28-15 (APM)
MARK GRODS,)	1:21-cr-437 (APM)
CALEB BERRY, and)	1:21-cr-460 (APM)
BRIAN ULRICH,)	1:22-cr-15-9 (APM)
)	
Defendants.)	

CONSENT MOTION TO CONTINUE SENTENCING

The government reports that Defendants Graydon Young, Jason Dolan, Mark Grods, Caleb Berry, and Brian Ulrich continue to cooperate with the government. The parties jointly request the Court continue the sentencing dates and corresponding briefing and presentence report deadlines currently scheduled for February 2024 through March 2024:

Name	Case #	Current Sentencing Date
Jason Dolan	21-cr-28	2/22/2024, 10:00am
Graydon Young	21-cr-28	3/7/2024, 2:00pm
Mark Grods	21-cr-437	3/11/2024, 2:00pm
Brian Ulrich	22-cr-15	3/14/2024, 10:00am
Caleb Berry	21-cr-460	3/19/2024, 2:00pm

Since the Court last postponed these sentencing hearings, certain proceedings before the Court related to this investigation have been vacated or rescheduled to later in the year. Defendant Thomas Caldwell’s sentencing, in *United States v. Rhodes, et al.*, Case No. 22-cr-15, was vacated and has not yet been rescheduled. Defendant Donovan Crowl’s sentencing, in *United States v. Crowl, et al.*, Case No. 21-cr-28, has been rescheduled for February 27, 2024. Defendant Jonathan Walden’s trial, in *United States v. Walden*, Case No. 22-cr-14, has been continued for a bench trial before the Court on April 2-3, 2024. And Defendant Jeremy Brown’s trial, in *United States v.*

Brown, Case No. 21-cr-619, which had been scheduled for March 4, 2024, was recently vacated at the defense's request; a new trial date will be selected at the status hearing on February 28, 2024.

In light of these proceedings scheduled in the middle of the cooperators' sentencing hearings, the parties jointly agree that it would be appropriate to continue the sentencing hearings logistically and substantively, assuming the Court's schedule can accommodate. Some cooperators may be called upon in trial preparation or at trial itself for the remaining pending cases. Should that be the case, the Court could most efficiently consider the full scope of the cooperators' potential substantial assistance to the government's investigation at sentencing hearings that post-date some of the upcoming pending proceedings. Therefore, the number of remaining proceedings warrant continuing the cooperator sentencings, just as the Court has on a number of occasions throughout the pendency of these cases.¹

Accordingly, the government and counsel for each of the above-captioned cooperating defendants have consulted and seek to continue these sentencing hearings. The parties can submit new proposed dates through Chambers. The parties would ask leave to submit these new proposed dates after February 28, 2024, for reasons outlined above. The parties are aware of the potential disruption this request may have on the Court's docket, and so are prepared to be flexible with the Court's schedule for new hearing and briefing dates.

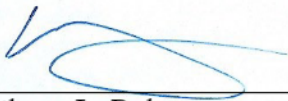
¹ There remain four additional cooperating defendants in related cases who are currently scheduled for sentencing hearings that the government does not seek to continue: James Breheny, Case No. 23-cr-179, on February 23, 2024; William Todd Wilson, Case No. 22-cr-152, on March 20, 2024; Jon Schaffer, Case No. 21-cr-306, on April 5, 2024; and Joshua James, Case No. 22-cr-15, on May 6, 2024. The government does not believe the issues discussed above impact those proceedings.

WHEREFORE, the United States respectfully submits this consent motion to continue sentencing for the above-captioned defendants.

Respectfully submitted,

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