

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

<b>UNITED STATES OF AMERICA</b>	:	<b>Case No: 21-cr-081 (DLF)</b>
	:	
<b>v.</b>	:	
	:	
<b>KEVIN DANIEL LOFTUS,</b>	:	
	:	
<b>Defendant.</b>	:	
<hr/>	:	

**CONSENT MOTION TO CONTINUE THE SENTENCING HEARING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and with the consent of the above defendant, by and through his counsel, respectfully submit this Consent Motion to Continue the Sentencing Hearing for approximately 30 days in the above captioned matter currently scheduled for Wednesday, February 2, 2022. In support of this motion, the government relies on the following points and authorities and any other such points and authorities as may be raised at any hearing on this matter.

- 1) The Court previously set the sentencing hearing in this matter for February 2, 2022, at 11:30 a.m.
- 2) Because the government request additional time to complete the necessary sentencing paperwork, the parties request that the sentencing hearing be continued for approximately 30 days or whatever date is consistent with the Court’s calendar.
- 3) If granted, the parties will reach out to the Court’s courtroom deputy to obtain the available date(s) for the Court and parties. In addition, the parties will file their respective sentencing memorandum on or before one week prior to the next sentencing hearing.
- 4) Further, on or before one week prior to the next sentencing hearing and consistent

with the Court's Minute Order dated January 26, 2022, "the government (and the defense, if it so chooses) shall provide the Court with videos that show the defendant's actions on January 6, 2021."

5) Undersigned counsel for the government can represent that counsel for the defendant consents to this motion and further advise the Court that the defendant agrees that the Speedy Trial Clock, pursuant to the Speedy Trial Act 18 U.S. Code § 3161, should be tolled until the next sentencing hearing in this matter.

6) Wherefore, the parties request the Court to continue this matter for approximately 30 days or whatever date is consistent with the Court's calendar.

Respectfully submitted,

MATTHEW M. GRAVES  
UNITED STATES ATTORNEY

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