

time to review and consider the information before deciding upon a sentencing recommendation for this case. Defense counsel needs approximately sixty additional days in order complete the investigation and preparation of the mitigating evidence and in order to provide effective assistance of counsel to Mr. Ivey at sentencing.

Wherefore, the parties respectfully request this Court continue the sentencing hearing for a period of approximately sixty days.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2021, I electronically filed the foregoing *Joint Motion to Continue Sentencing Hearing* with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Leslie A. Goemaat, Assistant United States Attorney, 555 4th St. N.W., Room 5840, Washington, D.C., 20530; and to Robert Walters, United States Probation Officer, 333 Constitution Avenue, N.W., Room 2214, Washington, D.C.

s/ R. David Baker
R. DAVID BAKER