

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

UNITED STATES OF AMERICA)	Docket No. 1:21-cr-00035-RC-5
)	
)	
v.)	
)	
JACK WADE WHITTON,)	The Honorable Rudolph Contreras
)	
)	
Defendant.)	

MOTION TO CONTINUE SENTENCING

And now, to-wit, comes the Defendant, Jack Whitton (hereinafter “Mr. Whitton”), by and through his counsel, Komron Jon Maknoon, and respectfully submits the within Motion to Continue Sentencing. In support thereof, he avers as follows:

1. On or about August 4, 2021, Mr. Whitton was indicted on alleged violations of 18 U.S.C. §§ 111 (a)(1), 18 U.S.C. §§ 111(a)(1)(b), and (2), 18 U.S.C. §§ 231(a)(3), 18 U.S. C. §§ 1752(a)(1), 18 U.S.C. §§ 1752(a)(2), 18 U.S. C. §§ 1752(a)(4), and 40 U.S.C. § 5104(e)(2)(F) (*See* ECF Doc. No. 92).

2. On or about November 17, 2021, a superseding indictment was filed alleging the same violations (*See* ECF Doc. No. 145).

3. On September 13, 2022, a Change of Plea was conducted pursuant to a Plea Agreement and Statement of the Offense (*See* ECF Doc. Nos. 225-6).

4. On December 12, 2022, undersigned counsel respectfully entered his appearance on behalf of Mr. Whitton (*See* ECF Doc. No. 259).

5. On December 13, 2022, a Final Presentence Investigation Report was filed (*See* ECF Doc. No. 261).

6. Currently scheduled and due are Sentencing Memoranda on February 21, 2023, and Sentencing in this matter is scheduled for March 6, 2023 (*See* ECF Doc. No. 262).

7. Due to undersigned counsel's recent entry of appearance and the need to acquire relevant supporting documents for sentencing, undersigned is respectfully requesting a continuance.

8. On February , 2023 Assistant United States Attorney Benet Kearney informed undersigned counsel that she consents to the relief sought within and for sentencing to be held sometime after the first week of June, 2023.

WHEREFORE, Mr. Whitton respectfully requests that this Honorable Court grant the Motion to Continue Sentencing until after the first week of June, 2023 or a date deemed more appropriate by this the Court as well as the respective dates of memoranda accordingly.

Respectfully submitted,

/s/ Komron Jon Maknoon
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