

**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 May 26, 2023, and Sentencing on June 14, 2023 (*See* ECF Doc. No. 280).

7. Undersigned counsel is still awaiting medical records from Piedmont Healthcare to consequently have Mr. Whitton undergo an evaluation necessary for sentencing.

8. Undersigned counsel has previously discussed with the medical professional, Dr. Yadira Baez-Lockard, Psy.D, the service to be provided once the records are received.

9. Assistant United States Attorney Benet Kearney informed undersigned counsel that she consents to the relief sought within and for sentencing to be continued 45 days.

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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