## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

VS. \* Case No. 1:21-cr-00572 (CRC)

JOSHUA DRESSEL \*

## CONSENT MOTION TO CONTINUE SENTENCING HEARING

The Defendant, by and through his attorney, Robert C. Bonsib, Esq., respectfully requests this Honorable Court to continue the sentencing hearing in the above matter and, as reasons therefore, states as follows:

- 1. The above matter is presently scheduled for a sentencing hearing on Friday, January 20, 2023, a date rescheduled from the original sentencing date of January 18, 2023. Undersigned counsel has prior scheduled court hearings on January 20, 2023 and is requesting that the sentencing hearing in this matter be rescheduled to a later date.
- 2. Additionally, undersigned counsel was involved in a homicide trial last week that did not finish until late on Friday and, as a result, undersigned counsel did not file a sentencing memorandum in this matter last week and would like additional time to file a sentencing memorandum in this matter.
- 3. Undersigned counsel has contacted Assistant United States Attorney Matthew Moeder who has authorized undersigned counsel to represent that the government consents to this request but requests, if this request is granted, that the new sentencing hearing date be cleared with him in advance as he must make travel arrangements to appear for the hearing.

WHEREFORE, it is respectfully requested that this Honorable Court grant the relief prayed.

Respectfully submitted,

/s/ Robert C. Bonsib

ROBERT C. BONSIB 64ll Ivy Lane, Suite ll6 Greenbelt, Maryland 20770 (30l) 44l-3000 office (301) 509-5100 cell robertbonsib@marcusbonsib.com Bar # 423-306

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing motion was sent, via ECF, this 16th day of January to Assistant United States Attorney Matthew Moeder, Office of the United States Attorney, 555 4th Street, NW, Washington, DC 205030

/s/ Robert C. Bonsib

ROBERT C. BONSIB