

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 21-cr-579 (DLF)**
 :
BRANDON STRAKA :
 :
 Defendant. :

**JOINT MOTION TO CONTINUE SENTENCING HEARING AND
VACATE SENTENCING RELATED DEADLINES**

The United States of America and defendant jointly move this Court to continue the sentencing hearing currently scheduled for December 22, 2021 and move this Court to vacate the deadline for sentencing memorandum to be filed.

On December 8, 2021, the defendant provided counsel for the government with information that may impact the government's sentencing recommendation. Additionally, the government is requesting additional time to investigate information provided in the Final Pre-Sentence Report. Because the government's sentencing recommendation may be impacted based on the newly discovered information, the government and defendant request a 30-day continuance of this case so that the information can be properly evaluated.

The government is currently ordered to file its sentencing memorandum and any video evidence in support of its memorandum on December 17, 2021. The government respectfully requests that this deadline be extended based upon the reasons stated.

CONCLUSION

For the foregoing reasons the parties respectfully request that the Court grant their motion to vacate the sentencing date currently set for December 22, 2021, grant a 30-day continuance of the above-captioned proceeding, and set a new submission deadline for the government's sentencing memorandum to be filed. The parties are united in their belief that the jointly request continuance will strongly facilitate their preparedness and the effectiveness of all counsel.

Respectfully submitted,

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