

**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 August 2, 2023, and Sentencing on August 16, 2023.

7. On July 7, 2023, Mr. Whitton underwent an extensive examination conducted by Christina P. Glisner, Ph.D., ABPP, a forensic psychologist, which lasted for several hours.

8. Despite the prior approval and scheduling of the aforementioned visit, logistical challenges at the facility prevented the examination from being successfully concluded.

9. Dr. Glisner has indicated that the earliest feasible timeframe for completing the examination is between the end of July and early August.

10. Upon the conclusion of the examination, Dr. Glisner will commence the preparation of her report, which will be utilized in the sentencing memorandum.

11. On July 12, 2023, Assistant United States Attorney Benet Kearney informed undersigned counsel that she consents to the relief sought within.

WHEREFORE, Mr. Whitton respectfully requests that this Honorable Court grant the Motion to Continue Sentencing until November 2023.

Respectfully submitted,

/s/ Komron Jon Maknoon
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