

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	Case No. 21-cr-676 (RC)
ROBERT CHAPMAN	:	
	:	
Defendant.	:	

**UNOPPOSED 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 April 4, 2022 and move this Court to vacate the deadline for sentencing memorandum to be filed.

Counsel for the government is beginning a trial in the Eastern District of Louisiana on Monday, March 28, 2022, in the matter of *United States v. Curtis Johnson, Jr.*, Criminal No. 17-CR-201. Due to trial preparation and outstanding hearings, the government is respectfully requesting additional time to file its sentencing memorandum, due to be filed March 25, 2022.

Additionally, counsel for the government respectfully requests a continuance of the April 4, 2022 sentencing. The undersigned is scheduled to be out of the office to address a family matter than cannot be reset. The undersigned has disclosed the matter to counsel for defense and will do so with the court if advised to do so.

The undersigned has conferred with counsel for the defendant regarding this request. Counsel has no objection to a continuance. Therefore, the government requests a continuance of thirty (30) days of the sentencing hearing, and a continuance of the filing deadlines for the submission of sentencing briefs for the government and counsel for defendant.

**CONCLUSION**

For the foregoing reasons the parties respectfully request that the Court grant this motion to vacate the sentencing date currently set for April 4, 2022, granting a 30-day continuance of the above-captioned proceeding, and set a new submission deadline for the government's sentencing memorandum to be filed.

Respectfully submitted,

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