

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

JACKSON KOSTOLSKY,

Defendant.

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Cr. No. 21-197 (DLF)

**UNOPPOSED MOTION TO CONTINUE THE SENTENCING HEARING AND
EXTEND THE DEADLINE FOR FILING SENTENCING MEMORANDA**

Mr. Jackson Kostolsky, the defendant, through undersigned counsel, respectfully moves this Honorable Court to continue the sentencing hearing and extend the deadline for filing a sentencing memoranda in this case. In support of this Motion, undersigned counsel respectfully submits the following:

1. On September 28, 2021, this Court accepted Mr. Kostolsky's guilty plea to count four of the information pursuant to a plea agreement. *See* ECF #28. Thereafter, a sentencing hearing was set in this case for December 21, 2021, at 11 a.m. *See* Minute Order, 9/28/21.

2. On December 13, 2021, undersigned counsel was advised by Mr. Kostolsky that he has not been feeling well. His health issues have impacted undersigned counsel's ability to effectively and adequately prepare for sentencing, thus the defense is requesting a continuance of his sentencing hearing so that his health can improve which in turn will lead to effective and adequate preparation for sentencing.

3. The government, through Assistant United States Attorney, Mona Furst, indicated that she has no objection to this request. Ms. Furst has further advised of that she is available for a sentencing hearing at any time after 11 am on January 11, 2022; any time on January 12, 2022;

and any time on January 19, 2022. The defense is also available at all of those dates and times.

4. Further, Mr. Kostolsky agrees to a video sentencing hearing which would negate the need for his presence in the District of Columbia.

WHEREFORE, for the foregoing reasons, the defense respectfully requests that this motion be granted and that this Court continue the sentencing. Further, the defense requests that any sentencing memoranda be submitted one week in advance of the rescheduled sentencing date.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

_____/s/_____
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