

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

vs.

NOTICE OF MOTION

21-CR-00652

TRACI J. SUNSTRUM,

Defendant,

MOTION TO ADJOURN SENTENCING DATE

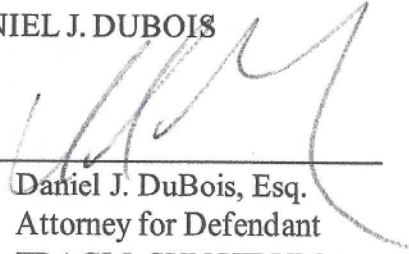
PLEASE TAKE NOTICE that upon the annexed Affidavit of Daniel J. DuBois, Esq., the undersigned hereby moves this Court for an adjournment of the abovementioned defendant's sentencing currently scheduled for February 10, 2022.

DATED: Buffalo, New York
January 13, 2022

Yours, etc.

DANIEL J. DUBOIS

By



Daniel J. DuBois, Esq.
Attorney for Defendant
TRACI J. SUNSTRUM
390 Elmwood Avenue
Buffalo, New York 14222
(716)563-6132

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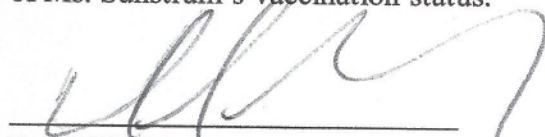
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STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

DANIEL J. DuBOIS, being duly sworn, deposes and states:

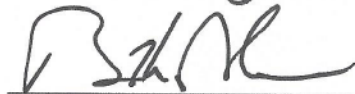
1. I am an attorney duly admitted to practice law in the District Court for the District of Columbia. I have been retained to represent Traci J. Sunstrum in the above-mentioned matter. This affidavit is submitted in support of the Defense's Motion to adjourn sentencing, or in the alternative allow the sentencing to proceed virtually. I have discussed this request with AUSA Jacob Strain, and it is my understanding he has no objection to said request.
2. On November 17, 2021, the defendant pled guilty to an Information charging her with a violation of Title 40, United States Code, Section 5104(e)(2)(G).
3. The Defendant is currently scheduled to be sentenced on February 10, 2022 at 2:00p.m. In order that the Court may have the benefit of the full nature and extent of the defendant's history, along with the fact that the defense is requiring additional time to prepare a comprehensive sentencing memoranda on Ms. Sunstrum's behalf, prior to sentencing her, the defense respectfully requests that the sentencing be adjourned for 90 days.

4. In the event our request for an adjournment is denied, we are respectfully requesting that the sentencing be held virtually because of Ms. Sunstrum's vaccination status.



DANIEL J. DUBOIS
Attorney for TRACI J. SUNSTRUM
390 Elmwood Ave.
Buffalo, New York 14222
716-563-6132

Subscribed and sworn to before me this 13
day of January 2022



Notary Public

BRIAN K. PARKER
Notary Public, State of New York
No. 02PA6220316
Qualified in Erie County
My Commission Expires April 12, 2022