

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

**UNITED STATES OF AMERICA** :  
 :  
 v. : **Case No. 1:21-cr-747 (JEB)**  
 **EMILY HERNANDEZ,** :  
 :  
 **Defendant.** :

**CONSENT MOTION TO CONTINUE SENTENCING HEARING**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, hereby moves this Court for a two-week continuance of the sentencing hearing in the above-captioned matter. The defense consents to this request. In support of its motion, the government states as follows:

- This morning, counsel for Paul Westover, a related defendant who traveled with the defendant in the instant case to Washington, D.C. on January 6, 2021, informed the government that he would be seeking a continuance of the sentencing hearing in that matter to allow more time for him to discuss the government’s sentencing memorandum and exhibits with his client. The government did not oppose this request.
- Subsequently, government counsel informed counsel for the defendant and for another related defendant, William Merry, of Westover’s counsel’s request and asked whether they would like to continue the sentencing hearings in their cases as well. Both agreed that these three related defendants should be sentenced on the same day.
- Counsel for both Merry and Westover have since filed motions to continue the sentencing hearings in those matters to April 11, 2022. *See United States v. Westover*, 21-cr-697, ECF No. 44; *United States v. Merry*, 21-cr-748, ECF No. 42.

- The government intends to show numerous video exhibits during its allocution for this trio of matters. Continuing the sentencing hearing in this matter to a date when all three related defendants could be sentenced would thereby conserve time and judicial resources.

For the foregoing reasons, the government respectfully requests that this Court grant a 14-day continuance of the March 21, 2022, sentencing hearing and set this matter for sentencing on April 11, 2022, or at a time thereafter that is convenient to the parties and the Court.

Respectfully submitted,

MATTHEW GRAVES  
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