

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Criminal No. 21 CR 103 (CJN)</b>
	:	
<b>ROBERT KEITH PACKER</b>	:	

**UNOPPOSED MOTION TO CONTINUE SENTENCING**

COMES NOW defendant, Robert Keith Packer, through undersigned counsel, Stephen F. Brennwald, in support of this Unopposed Motion to Continue Sentencing, states as follows:

1. Defendant pled guilty to a charge of “parading” in the United States Capitol, and is scheduled to be sentenced on Monday, May 23, 2022.
2. On Monday, May 16, 2022, the government filed its sentencing memorandum, asking the Court to sentence Mr. Packer to 75 days in jail, 36 months of probation, 60 hours of community service, and \$500 in restitution.
3. The government’s memorandum is 46 pages long, and contains a very thorough discussion of the events of January 6, 2021.
4. The memorandum is supplemented by a 20-page addendum that contains a list of sentences imposed (as well as the government’s sentencing request in each case).
5. Responding to the government’s request and memorandum will require a great deal of time, and is not something that can, or should, be done casually. Undersigned counsel certainly does not treat this case – or any case – lightly, even if it is a misdemeanor.
6. In addition, the government, on this date, uploaded to USAfx a list of exhibits it wants this Court to consider when imposing a sentence.

7. Although these materials have already been provided in discovery, counsel needs to specifically review these materials with Mr. Packer ahead of sentencing. Because there is so much to discuss and review with Mr. Packer, counsel expects to travel to Newport News, Virginia, to go over all of the government's submissions.
8. All of this, unfortunately, cannot be accomplished before the upcoming hearing next Monday.
9. The United States, graciously, does not oppose the defendant's motion.
10. Because the task ahead is fairly daunting, a continuance of a week or two will likely not suffice. In addition, the government is not available between June 6 and June 20, 2022. Thus, defendant asks that this Court schedule sentencing on either June 22, 23, or 24 (undersigned counsel is available on the 24<sup>th</sup> in the afternoon), or on any other date that is available to this Court and the parties.

WHEREFORE, in light of the foregoing, and for any other reasons that may appear to this Court, defendant prays that the Court postpone sentencing in this case to the dates proposed above, and for any other relief this Court deems proper.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing motion was sent, by ECF, this 17<sup>th</sup> day of May, 2022, to all parties of record.

/s/

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Stephen F. Brennwald