UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

.

v. : Criminal No. 1:21-cr-00538-DLF

:

JACOB TRAVIS CLARK,

:

Defendant.

CONSENT MOTION TO CONTINUE SENTENCING HEARING

Jacob Clark, with consent of the United States, moves this Court for a 60-day continuance of the status conference currently scheduled for May 8, 2023. In support of its motion, Mr. Clark states the following facts.

On January 30, 2023, Mr. Clark waived his right to a jury trial and agreed to a Statement of the Offense in a stipulated bench trial. Since then, Mr. Clark has been interviewed by U.S. Probation for its Presentence Investigation Report. The interview revealed previously unknown childhood trauma and other information that would potentially affect the Court's view of Mr. Clark's history and characteristics at sentencing. Counsel is thus in the process of collecting records that would be relevant to the Court's consideration.

The government consents to this Motion.

Conclusion

Mr. Clark thus respectfully requests that this Court grant the motion for a 60-day continuance of the currently scheduled sentencing hearing to a date around the second week of July 2023.

Respectfully submitted,

A.J. KRAMER FEDERAL PUBLIC DEFENDER

/s/

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