

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

UNITED STATES OF AMERICA,

v.

KLETE DERIK KELLER,
Defendant.

Case No.: 1:21-cr-00104-RJL

Hon. Richard J. Leon

**JOINT MOTION TO CONTINUE
DEFENDANT'S SENTENCING**

Both parties, Klete Derik Keller through counsel and the United States of America through counsel, respectfully submit this motion and accompanying Order asking the Court to briefly continue the Sentencing hearing currently docketed for July 7, 2023, at 3:30 PM. In support thereof, the parties state as follows:

DISCUSSION

Since undersigned counsel entered his appearance in the above-captioned matter on March 27, 2023, Mr. Klete Keller has been actively cooperating in ongoing law enforcement investigations. To further facilitate this effort, the parties jointly move to continue Mr. Keller's Sentencing hearing and the corresponding briefing schedule.

Currently, the briefing schedule is as follows: the parties' respective objections and corrections to the Draft Presentence Investigation Report are due Friday, June 16, 2023, Dkt. 46, and their corresponding sentencing memorandums are due no later than June 30, 2023. *See* Min. Order, 03/28/2023. Mr. Keller's Sentencing hearing is currently set for July 7, 2023, at 3:30 PM.

Without assuming the availability of the Court's docket, the parties propose to reach out to the Court directly, no later than July 5, 2023, to suggest new dates for both the sentencing hearing and briefing schedule.

CONCLUSION

In light of the aforementioned reasons, the parties respectfully ask this Court to enter the attached Order striking the July 7, 2023 Sentencing Hearing and accompanying briefing schedule from the docket in the above-captioned matter; and directing the parties to file with the Court, no later than July 5, 2023, a joint schedule of proposed dates to reset both the Sentencing Hearing and related briefing schedule.

Respectfully Submitted,

KLETE DERIK KELLER,
By Counsel

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of June 2023, I filed the foregoing pleading through the ECF system, which shall then send an electronic copy of this pleading to all parties in this action.

_____/s/_____
Zachary A. Deubler, D.C. Bar #1615063