

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Crim. No. 21-CR-103 (CJN)
	:	
ROBERT PACKER	:	

UNOPPOSED MOTION TO CONTINUE SENTENCING

Defendant, Robert Keith Packer, through undersigned counsel, Stephen F. Brennwald, Brennwald & Robertson, respectfully moves this Court to continue the sentencing set for July 29, 2022, to August 25, 2022, at 2 p.m. To the extent necessary (in light of the defendant's plea), defendant consents to the exclusion of time under the Speedy Trial Act between July 29, 2022 and August 25, 2022. In support of this unopposed motion, defendant states as follows:

1. This matter is set for sentencing on July 29, 2022.
2. Given that date, any sentencing memoranda would be due a week prior – in this case, on July 22, 2022.
3. Unfortunately, undersigned counsel still needs to meet with Mr. Packer to discuss a host of issues ahead of sentencing, and because Mr. Packer is unable to drive to undersigned counsel's office for reasons that do not need to be discussed here, counsel must travel to see him.
4. Defendant lives over three hours from the District of Columbia. In order to save the government money, undersigned counsel is hoping that he can combine a visit to a client who is incarcerated at the Northern Neck Regional Jail with the visit to see Mr. Packer in Newport News, Virginia.
5. Counsel is waiting to obtain a preliminary presentence investigation report in that matter, and he expects that that will happen in the next week or two.

6. In light of this, defendant asks that the sentencing hearing in this case be pushed back to August 25, 2022, at 2 p.m. – a date that has been cleared with the government and this Court.

7. As noted above, Mr. Packer agrees to toll the time between July 29, 2022 and August 25, 2022 under the Speedy Trial Act.

8. The government does not oppose this request.

WHEREFORE, for the foregoing reasons, defendant respectfully requests that the Court GRANT this unopposed motion to continue the sentencing hearing to August 25, 2022, at 2 p.m., and that the Court exclude the period from July 29, 2022, and August 25, 2022 from the computation of time under the Speedy Trial Act.

Respectfully submitted,

Stephen F. Brennwald

Stephen F. Brennwald
Bar No. 398319
Brennwald & Robertson, LLP
922 Pennsylvania Avenue, S.E.
Washington, D.C. 20003
(301) 928-7727
sfbrennwald@cs.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was sent, by ECF, this 19th day of July, 2022, to all parties of record.

Stephen F. Brennwald

Stephen F. Brennwald