

**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. :

MOTION TO CONTINUE SENTENCING HEARING

Jacob Clark, moves this Court for a 60-day continuance of his sentencing hearing, currently scheduled for July 17, 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, accepted responsibility for his actions on January 6, 2021 and agreed to a Statement of the Offense in a stipulated bench trial. During the presentence investigation, it was revealed that Mr. Clark had experienced significant childhood trauma relevant to Mr. Clark’s history and characteristics. To that end, counsel has discussed a potential evaluation with a clinical psychologist in order to present to the Court a fulsome landscape of Mr. Clark’s mental health. Because Mr. Clark resides in Wyoming, counsel’s search for an appropriate specialist has taken more time than expected. Still, counsel expects that a 60 day continuance would be sufficient to provide all relevant information to the Court.

The government defers to the Court on 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 September 2023.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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