

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

CASE NO. 21-CR-387-APM

AUDREY SOUTHARD-RUMSEY,

Defendant.

MOTION TO CONTINUE SENTENCING

DEFENDANT, Audrey Southard-Rumsey, via undersigned counsel, moves this Honorable Court to continue her sentencing hearing scheduled for June 15th, 2023 at 2:00p.m. to a date after September 15th, 2023 that is convenient for the Court, and as grounds states as follows:

1. Ms. Southard-Rumsey stood trial (stipulated fact) on January 28th, 2023.
2. The sentencing date was originally scheduled for June 2nd, 2023, however, the Court reset to June 15th, 2023.
3. Counsel and Probation had attempted to schedule an interview time for Ms. Southard-Rumsey for purposes of the initial PSR (due April 18th, 2023). Counsel and probation's respective schedules were in conflict and the interview could not be had.
4. The Government is unopposed to a sentencing reset date.
5. Probation, counsel, and the Government conferred and propose a reset date after September 15th, 2023 to give sufficient time for Sentencing Memoranda and final PSR report, if the Court could accommodate.
6. Counsel has filed this unopposed Motion in good faith and not for the purpose of frustration or any undue delay.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Continue Sentencing has been furnished via Electronic Filing to Alexis Loeb, AUSA, Office of the U.S. Attorney, District of Columbia, alexis.loeb@usdoj.gov, Robert L. Jenkins, Jr., Esq., Rjenkins@BynumAndJenkinsLaw.com, 1010 Cameron St., Alexandria, VA 22314, Robert_Walters@dcp.uscourts.gov on this 21st day of April, 2023.

/s/ Maria T. Rodriguez

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