

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

**UNITED STATES OF AMERICA**

**v.**

**JACOB TRAVIS CLARK**

**Defendant.**

**Case No. 21-CR-538 (DLF)**

**GOVERNMENT’S RESPONSE TO DEFENDANT’S MOTION TO CONTINUE  
SENTENCING HEARING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this response to the Defendant’s Motion to Continue Sentence Hearing scheduled for July 17, 2023. On April 28, 2023, the defendant filed a motion to continue requesting a 60-day continuance to seek records pertaining to Mr. Clark’s childhood trauma. *See* ECF 47. The government did not oppose this motion. *Id.* The court granted this motion and scheduled the sentencing hearing for July 17, 2023. On July 6, 2023, the defendant filed a second motion to continue requesting another 60-day continuance to complete an evaluation of Mr. Clark based on his childhood trauma. *See* ECF 50. The government defers to the court as to whether it grants a continuance in this matter, however, we submit that this case has been on this Court’s docket since Mr. Clark’s arrest in April 2021. The government has a strong interest in resolving these matters before the court, and Mr. Clark’s counsel indicated that he has been aware of the defendant’s childhood trauma from the Draft Presentencing Investigation Report, which was filed almost four months ago in March 2023. *See* ECF 47.

Respectfully submitted,

MATTHEW M. GRAVES  
UNITED STATES ATTORNEY



BY:

---

Nialah S. Ferrer  
Assistant United States Attorney  
New York Bar No. 5748462  
601 D Street, NW  
Washington, D.C. 20530  
(202) 557-1490  
Nialah.Ferrer@usdoj.gov