

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

**UNITED STATES OF AMERICA,**

**v.**

**JON THOMAS MOTT,**

**Defendant.**

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**Case No. 21-CR-00464 (RCL)**

**UNOPPOSED MOTION FOR CONTINUANCE OF SENTENCING HEARING**

**COMES NOW** Defendant (Mr. Mott), by and through undersigned counsel, and respectfully tenders his unopposed motion for Continuance of Sentencing Hearing and in support thereof states as follows:

1. On November 30<sup>th</sup>, 2022, this Court set this matter for Sentencing.
2. Counsel for the Defendant and Counsel for the Government have been in communication regarding the hearing and the pending Sentencing Memorandums to be filed herein.
3. Counsel for the Government has advised that their Sentencing Memorandum is expected to be lengthy and has, as of the date of the filing of this motion, not been filed.
4. Mr. Mott expects to file a response to the Government's Sentencing Memorandum as well as a Memorandum of his own, which the Government will, in all probability, wish to file their own response to.
5. Even were the Government to provide their Sentencing Memorandum today, Mr. Mott would be left with only five business days wherein to prepare his response and Memorandum.

6. Counsel for the Government has been consulted and has no objection to Mr. Mott's motion for a continuance for the afore stated reasons.
7. This motion is not meant for vexatious delay.

**WHEREFORE** Defendant respectfully prays this Court make and enter its Order continuing the sentencing hearing in this matter until such time as both parties have opportunity to file and respond to the sentencing memorandums, and for such other and further relief as this Court shall deem just and proper on the premise.

Respectfully submitted,



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**Attorney for Defendant**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 28th day of February 2023, I filed the foregoing Unopposed Motion to Continue the Sentencing Hearing and a proposed Order by the Court's CM/ECF system. All case registered parties will be served by CM/ECF.



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Joseph W. Allen