

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 21-CR-223 (APM)
)
)
 MATTHEW MARK WOOD)

Unopposed Motion for Continuance

The defendant, Matthew Mark Wood, by his attorney, Kira Anne West, respectfully requests a continuance of the sentencing currently scheduled before Your Honor on September 23rd, at 2:00 p.m., and states the following in support:

1. Undersigned counsel is inundated with J6 cases. She currently has a trial set on October 5, 2022, before Judge Bates in *United States v. Neely*, 21 CR 642. She is also set for trial before Judge Cooper in *United States v. Egtvedt*, 21 CR 177 on December 5, 2022. She was getting ready for trial in *United States v. Harkrider*, 21 CR 117, that was set for November 1, 2022 but was recently vacated by Judge Hogan due to health issues of the attorney for the co-defendant in the case.
2. On October 4, 2022, undersigned counsel has oral argument before the D.C. Circuit in *United States v. Aurelio Cano Flores*, 21-3002. Just last week, undersigned counsel was in trial all week in Superior Court in *United States v. Penn*. She also filed an opening brief on August 29, 2022 in the D.C. Circuit in an under seal case.
3. Undersigned counsel also has a plea in federal court in an under seal case at 2:30 on September 23rd. This plea is before Judge Moss.
4. The sentencing before Your Honor requires in depth research and analysis of other J6 cases

due to the objections lodged by the Government. Moreover, undersigned counsel intends to file a sentencing memo accompanied by video interviews which will take additional time. Undersigned counsel believes the above is "good cause" for why a continuance is merited in this case.

5. Undersigned counsel has spoken with Assistant United States Attorney Sean Murphy and the probation officer, Kelli Willit, and neither opposes this motion for continuance. Undersigned counsel believes mid to late October would be appropriate and will confer with the Court's courtroom deputy, opposing counsel and the probation officer.
6. This motion is not made for delay but so Mr. Wood's counsel can make the best argument possible at sentencing.

Respectfully submitted,

KIRA ANNE WEST

By: /s/
Kira Anne West
DC Bar No. 993523
712 H Street N.E., Unit #509
Washington, D.C. 20002
Phone: 202-236-2042
kiraannewest@gmail.com

CERTIFICATE OF SERVICE

I hereby certify on the 6th day of September, 2022 a copy of same was electronically filed using the CM/ECF system and thus delivered to the parties of record and pursuant to the rules of the Clerk of Court.

/s/

Kira Anne West

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 21-CR-233(APM)
)	
)	
MATTHEW MARK WOOD)	

ORDER

Pending before the Court is the unopposed motion of defendant, Matthew Mark Wood, seeking continuance of his sentencing. Finding good cause has been shown and the motion being unopposed, it is hereby ORDERED that this matter is continued until _____, 2022.

SO ORDERED this _____ day of _____, 2022.

Amit P. Mehta
United States District Judge