

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

UNITED STATES OF AMERICA :

v. : 21-CR-151-CKK

BARTON SHIVELY :

CONSENT MOTION TO CONTINUE SENTENCING HEARING

Mr. Barton Shively, through undersigned counsel, respectfully moves to continue the sentencing hearing to provide an opportunity to review records provided earlier today, together with the email correspondence associated with the records. The government consents to this motion. The government and the defense have conferred as to available dates. The government is not available during the week of February 21-24, 2023. The government and the defense are mutually available on the following days and times during the following week:

Monday, February 27, 2023: 1:00 p.m. or after. (Defense counsel has a 10:00 a.m. sentencing hearing before another judge in the courthouse)

Tuesday, February 28, 2023: all day

Thursday, March 2, 2023: all day

WHEREFORE, Mr. Shively respectfully moves the Court to continue his sentencing hearing in this matter. A proposed order is attached.

/s/ EDWARD J. UNGVARSKY
EDWARD J. UNGVARSKY
Ungvarsky Law, PLLC
421 King Street, Suite 505
Alexandria, VA 22314
Office: (571) 207-9710
Cell: (202) 409-2084

Fax: (571) 777-9933
ed@ungvarskylaw.com

Counsel for Barton Shively