## IN THE UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA (Washington DC)

UNITED STATES OF AMERICA	) CASE NO: 1:21-cr 00341
DI : 4166	)
Plaintiff,	) JUDGE COLLEEN KOLLAR
	) KOTELLY
	)
-VS-	)
	)
JOHN DOUGLAS WRIGHT	) MOTION TO CONTINUE
	) <u>SENTENCING MEMORANDUM</u>
Defendant.	) AND SENTENCING DATE
	)

Now comes the Defendant, **JOHN DOUGLAS WRIGHT**, by and through undersigned counsel, and hereby and respectfully requests that this Court grant a continuance of the Sentencing Memorandum due date which is set for November 14, 2022 and requests for a continuance of Sentencing which is currently scheduled for November 28, 2022 at 1:30 p.m.

The basis for this request is that counsel for the Defendant needs additional time to review the Presentence Investigation Report and prepare mitigation packet for Sentencing Memorandum. Counsel is still awaiting documentation to include in presentation to the court. This request is not made for delay, but to have an opportunity to fully present Mr. Wright's case for Sentencing.

Wherefore, counsel for Defendant requests a continuance of the due date of November 14, 2022 for the Sentencing Memorandum and the Sentencing date of November 28, 2022 at 1:30 p.m.

Respectfully submitted,

/s/ Noah C. Munyer

Noah C. Munyer (0086575) Attorney for John Douglas Wright 121 South Main Street, Suite 520 Akron, Ohio 44308 attorneymunyer@gmail.com (330) 253-0785 (telephone) (330) 253-7432 (facsimile

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of November 2022 a copy of the Notice of Intent to Plead Guilty and Convert Status Hearing to a Change of a Plea Hearing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/ Noah C. Munyer

Noah C. Munyer (0086575) Attorney for John Douglas Wright