

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-341 (CKK)
	:	
JOHN DOUGLAS WRIGHT,	:	
	:	
Defendant.	:	

MOTION TO CONTINUE SENTENCING MEMORANDUM AND SENTENCING DATE

Now comes the Government, by and through undersigned counsel, and hereby and respectfully requests that the Court grant a continuance of the Sentencing Memorandum due date, which is set for December 14, 2022, and requests for a continuance of Sentencing, which is currently scheduled for January 18, 2022, at 10:00 a.m.

The basis for this request is that the Government needs additional time to review whether any upward departure is appropriate, and to identify the just and fair sentence for the Court. Defense counsel is unopposed to the continuance and wishes to address the application of an upward departure in the Defendant’s Sentencing Memorandum as well.

WHEREFORE, counsel for the Government requests a continuance of the due date of December 14, 2022 for the Sentencing Memorandum and the Sentencing Date of January 18, 2022 at 10:00 a.m.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: *wn widman*

WILL N. WIDMAN
NC Bar No. 48158
Trial Attorney, Detailee
1301 New York Avenue NW, 8th Floor
Washington, DC 20530
(202) 353-8611
Will.Widman@usdoj.gov