

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

**UNITED STATES OF AMERICA** :  
 : **Case No. 1:21-cr-278-2 (BAH)**  
 v. :  
 :  
**DANIEL HERENDEEN,** :  
 :  
 **Defendant.** :

**MOTION FOR CONTINUANCE OF SENTENCING HEARING**

The United States through its attorneys, Matthew Graves, United States Attorney for the District of Columbia, and Anita Eve, Assistant United States Attorney, and defendant Daniel Herendeen, through his counsel, Colleen Fitzharris, hereby respectfully move the Court for a continuance of the sentencing hearing scheduled in the above-captioned matters on March 3, 2022. In support of this Motion, the parties represent as follows:

1. As this Court is aware, the sentencing hearing in this matter is scheduled to commence on March 3, 2022 at 9:30 a.m. EST and the date of the deadline for the filing of this motion for continuance of the sentencing hearing is February 18, 2022.
2. This is the first motion for continuance of the sentencing hearing filed by the government and the defendant.
3. The final Presentence Investigation Report from the United States Probation Office has not been received by either party. Both counsel for the government and the defendant require the additional time requested to review the final report and incorporate the report into their sentencing memoranda. Furthermore, the continuance will also allow both parties the time needed to reply to the sentencing memorandum filed by the opposing party.

4. The parties propose the following dates for the rescheduled sentencing hearing:

March 21, March 28, or April 1, 2022.

Respectfully submitted,

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

By: /s/ Anita Eve  
Anita Eve  
Assistant United States Attorney, Detailee  
PA Bar No. 45519

**CERTIFICATE OF SERVICE**

On this 17th day of February 2022, a copy of the foregoing was served upon all parties listed on the Electronic Case Filing (ECF) System.

*/s/ Anita Eve*  
Anita Eve  
Assistant United States Attorney