

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

UNITED STATES OF AMERICA)

v.)

DANIEL GOODWYN,)

Defendant.)

Case No. 1:21-cr-00153 (RBW)

UNOPPOSED DEFENDANT'S MOTION FOR SENTENCING VIA VTC

Comes now the Defendant, Daniel Goodwyn, by and through his undersigned attorney, and respectfully moves this court for his misdemeanor sentencing currently scheduled for 10:00 a.m. on June 5, 2023 in the courthouse to instead be via video teleconference; and he provides the following in support:

By the most recent order at ECF No. 87, sentencing is to occur in the courthouse at 10:00 a.m. on June 5, 2023. The CARES Act has not been rescinded. The Court's Standing Order 22-64 (BAH) has not been revoked and the conditions in paragraph (b)(ii) for its expiration have not been met. The Order allows for certain proceedings via video teleconferencing (VTC). Judges continue to allow VTC sentencing for guilty pleas to be scheduled in June 2023 according to the Court's calendar.

In addition to continuing Covid-19 concerns and spikes, the above request seeks to mitigate related uncertainty given that air travel for Mr. Goodwyn and family from outside the District remains tenuous due to airline cancellations and delays that have occurred year round with no warning. Further, without disclosing significant personal medical information, undersigned counsel is immunocompromised, and has an unresolved family health issue at home. As such, counsel limits travel outside the immediate area to a short driving distance, and only that which is

required for work; and requests the Court's support in allowing the VTC instead of an in-person proceeding on June 5, 2023.

WHEREFORE, Mr. Goodwyn requests that for good cause the Court issue the proposed order to change the June 5, 2023 sentencing from in-person to a video teleconference.

Dated March 27, 2023

Respectfully submitted,

/s/ Carolyn Stewart

Carolyn A. Stewart, Bar No. FL-0098

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CERTIFICATE OF SERVICE

I hereby certify on the 27th day of March 2023, a copy of the foregoing was served upon all parties as forwarded through the Electronic Case Filing (ECF) System.

/s/ Carolyn Stewart

Carolyn Stewart, Esq.