

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

UNITED STATES OF AMERICA

V.

RONALDN SANDLIN, et. al.,

Defendant

Case No. 21-cr-00088-DLF

**DEFENDANT NATHAN DEGRAVE’S UNOPPOSED MOTION
TO CONTINUE SENTENCING**

NOW COMES Defendant Nathan DeGrave by and through his undersigned counsel of record, William L. Shipley, requesting this Honorable Court to continue the sentencing currently set for March 21, 2023 and extended all filing deadlines regarding sentencing.

On June 27, 2022 this Court ordered Defendant DeGrave released from custody after entering a plea of guilty to Counts One and Three of the Indictment. *See* EFC No. 76. As part of the conditions of release, Defendant DeGrave was subject to Home Incarceration and restricted to 24-hour-a-day lock-down. *Id.*

While trying to plan travel to Washington D.C. for sentencing, Defendant DeGrave ran into difficulty obtaining an official identification because documents he needed to submit to the State of Nevada were not in his possession and obtaining them was made difficult and time-consuming by his terms and conditions of release. He was not been able to timely secure an official identification, and arranging to travel from Nevada to Washington DC has been challenging as a result. Those difficulties have been resolved but he will not have the necessary identification in time for the sentencing hearing as currently set.

The Government has been apprised of the situation, and has no objection to continuing the sentencing hearing based thereon.

Further, the parties believe there may be additional information developed in the near future that might bear upon the decisions the Court will be called upon to make at the time of sentencing. The requested continuance will allow the parties to better develop that information and timely submit it to the Court for consideration.

Wherefore, Defendant DeGrave requests this Honorable Court to continue the sentencing currently set for March 21, 2023 and extended all filing deadlines regarding sentencing.

Dated: March 14, 2023

Respectfully submitted,

/s/ William L. Shipley
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