IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, :

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v. : Case No. 1:21-cr-0091-RCL-01

:

CRAIG MICHAEL BINGERT, et al.:

Defendant. :

CONSENT MOTION TO CONTINUE SENTENCING HEARING SCHEDULED FOR SEPTEMBER 25, 2023 AT 4:30 P.M.

COMES NOW CRAIG MICHAEL BINGERT, by and through counsel, and hereby requests the entry of an order continuing the sentencing hearing scheduled for September 25, 2023, at 4:30 p.m., to a date convenient to the Court and to the parties. As grounds, the following submitted:

- 1. This motion is consented to per AUSA Kaitlin Klamann.
- 2. If the Court intends to conduct a sentencing hearing at the same date/time for both Mr. Bingert and Mr. Sturgeon, then AFPD Maria Jacob consents to this motion.
- 3. Undersigned counsel is not available on September 25, 2023, because that day is Yom Kipper religious holiday which counsel observes.
 - 4. The following dates/times are suggested:

September 26, 2023, or September 27, 2023...

(Please note undersigned counsel will be out of town and unavailable October 9, 2023, through October 23, 2023.)

5. If these proposed dates are not good for the Court, then the parties respectfully ask that the Courtroom Clerk contact counsel to discuss good dates/times.

WHEREFORE, for the foregoing reasons and such other reasons which may appear just and proper, the parties request the entry of an order continuing the sentencing hearing scheduled for September 25, 2023, at 4:30 p.m., to a date convenient to the Court and to the parties.

Respectfully Submitted,

Allen H. Orenberg, # 395519 The Orenberg Law Firm, P.C. 12505 Park Potomac Avenue, 6th Floor Potomac, Maryland 20854 Tel. No. 301-984-8005 Cell Phone No. 301-807-3847 Fax No. 301-984-8008 aorenberg@orenberglaw.com

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2023, copies of the foregoing Motion to Continue Sentencing Hearing Scheduled for September 25, 2023, at 4:30 p.m. and a proposed Order, were served to case registered parties by CM/ECF.

Allen H. Orenberg, # 395519