

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 21-cr-00116
)	
WILLIAM MCCALL CALHOUN, JR)	
<i>Defendant.</i>)	

UNOPPOSED MOTION FOR A BENCH TRIAL

COMES NOW, Defendant, William McCall Calhoun, Jr., by and through counsel, Jessica N. Sherman-Stoltz, Esq., and pursuant to Fed. R. Crim. P 23(a), respectfully files this unopposed motion for a bench trial, in lieu of a jury trial, in the above-referenced case before this Court. In support of his Motion, he sets forth the following facts and argument:

I. ARGUMENT

1. Defendant, William McCall Calhoun, has executed a Jury Trial Waiver, which is attached hereto as Exhibit A.
2. The Government has informed Undersigned Counsel that it does not oppose a bench trial in this case.
3. Mr. Calhoun's recovery from his two previous foot surgeries is not progressing as quickly as expected, and his doctor does not recommend that Mr. Calhoun travel, or be on his feet as much as traveling would require, at least until after January of 2023. Mr. Calhoun has a follow-up appointment on January 11, 2023 and will have

a better idea after that appointment as to when he will be cleared to travel to Washington, DC for his trial proceedings in this case. (Letter from his doctor has been requested and will be provided to the Court as soon as received.)

4. If this Court grants Mr. Calhoun's Motion for a Bench Trial, he requests that the bench trial be set after January 31, 2023, or upon such date that his doctor recommends at his January 11th follow-up appointment, whichever comes first.

II. CONCLUSION

WHEREFORE, Defendant, William Calhoun, respectfully requests this Court grant his Motion for a bench trial.

Dated: December 12, 2022.

Respectfully Submitted,
WILLIAM MCCALL CALHOUN, JR.

/s/ Jessica N. Sherman-Stoltz
Jessica N. Sherman-Stoltz, Esq.
Virginia State Bar #90172
Sherman-Stoltz Law Group, PLLC.
P.O. Box 69, Gum Spring, VA 23065
Phone: (540) 451-7451 / Fax: (540) 572-4272
Email: jessica@sslawgroupva.com

CERTIFICATE OF SERVICE

I hereby CERTIFY that on this the 12th day of December 2022, a true and correct copy of the foregoing *Motion for a Bench Trial* with the Clerk of Court via the CM/ECF system, which will automatically send an email notification of such filing to all counsel of record.

/s/ Jessica N. Sherman-Stoltz
Jessica N. Sherman-Stoltz, Esq.
Virginia State Bar #90172
Sherman-Stoltz Law Group, PLLC.