## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

CASE NO. 1:21-CR-00116 DLF

**v.** 

•

WILLIAM McCALL CALHOUN,

•

Defendant.

## <u>UNITED STATES' UNOPPOSED MOTION TO CONTINUE SENTENCING</u>

The United States respectfully moves this Court to continue the sentencing hearing currently set for July 6, 2023 and the corresponding briefing schedule. As grounds for its motion, the United States relies on the following:

- 1. On March 20, 2023, after a bench trial, the defendant was convicted on all counts in the Superseding Indictment. ECF No. 163.
- 2. The Court scheduled the sentencing hearing for July 6, 2023.
- 3. The government now moves to continue the sentencing to August 2023.
  Undersigned counsel expects to be on family leave on July 6, 2023, and will therefore not be able to attend the July 6th sentencing date. A short continuance would allow both government trial attorneys to attend the sentencing hearing.
- 4. Defense consents to the instant motion as a continuance would allow the defendant additional time to wind down his law practice.
- The parties have conferred and are available on the following dates: August 21,22, 23, 28, 29, 30, or 31st.
- 6. If the Court is inclined to grant the motion, the parties would also request that sentencing memoranda be due two weeks before the new sentencing date.

WHEREFORE, the United States respectfully requests that the Court grant the instant

motion and continue the sentencing to a mutually agreeable in August 2023.

Respectfully submitted,

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