

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

UNITED STATES OF AMERICA :

v. : 21-CR-151-CKK

BARTON SHIVELY :

**UNOPPOSED MOTION TO EXTEND TIME TO FILE DEFENSE SENTENCING
MEMORANDUM TO JANUARY**

Barton Shively, through counsel, respectfully moves to extend the time to file his Sentencing Memorandum from January 20, 2023 to January 24, 2023. The government does not oppose this motion. As bases, undersigned counsel, on behalf of Mr. Shively, provides the following; Counsel needs time to meet with Mr. Shively to discuss the government's sentencing memo (which counsel dropped off to Mr. Shively on Martin Luther King, Jr. (observed) Birthday); to discuss the draft of counsel's memo on behalf of Mr. Shively; and to discuss an attachment to the defense sentencing memo with Mr. Shively. Counsel has been teaching out of town all week, returning tomorrow afternoon. Counsel will finish the draft and meet with Mr. Shively and submit the defense sentencing memo by Tuesday, January 24th. The sentencing hearing is February 3, 2023.

WHEREFORE, Mr. Shively respectfully moves the Court to extend the time by which his sentencing memorandum is due to January 24, 2023. A proposed order is attached.

/s/ EDWARD J. UNGVARSKY
EDWARD J. UNGVARSKY
Ungvarsky Law, PLLC
421 King Street, Suite 505
Alexandria, VA 22314
Office: (571) 207-9710

Cell: (202) 409-2084
Fax: (571) 777-9933
ed@ungvarskylaw.com

Counsel for Barton Shively