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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	
Plaintiff,	
V.	. Criminal Action No.: 21-CR-000287-TNM
HUNTER SEEFRIED,	
Defendant.	

DEFENDANT'S UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

Defendant, Hunter Seefried, by and through his undersigned counsel, Edson A. Bostic, Esquire, hereby moves this Court for an Order continuing the Sentencing Hearing in this case.

In support of this motion, it is averred as follows:

The Court scheduled Mr. Seefried's sentencing hearing for September 23, 2022, at
2:00 p.m.

2. Mr. Seefried is and has been on pretrial release since his initial appearance before this Court on January 25, 2021. He is employed and is in full compliance with the conditions of release.

3. Counsel recently received a draft Presentence Report on August 19, 2022. There are several issues in the draft PSR which requires Counsel to file substantive objections. As such Counsel, therefore, requires additional time to meet with Mr. Seefried to review the draft PSR, conduct factual and legal research and file substantive objections thereto.

4. Moreover, counsel is leaving on Monday, August 29, 2022, to embark on an extended, preplanned trip outside the country until September 16, 2022, when the defendant's sentencing memorandum is due.

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5. In light of the foregoing, the defense respectfully requests that the sentencing hearing be continued for approximately thirty (30) days, until or after October 24, 2022, in order to allow Counsel adequate time to properly and thoroughly prepare for sentencing.

6. Assistant United States Attorney, Brittany Read, has been informed counsel's intent to file the instant motion, and the government does not oppose the instant motion.

WHEREFORE, for the above-stated reasons and any other such reasons that shall appear to the Court, it is respectfully requested that the Sentencing Hearing in this matter be continued to a date and time on or after October 24, 2022, if consistent with the Court's calendar.

Respectfully submitted,

Dated: August 23, 2022

<u>/s/ Edson A. Bostic</u> EDSON A. BOSTIC, ESQUIRE Federal Public Defender

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Attorney for Defendant, Hunter Seefried