UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

)	
UNITED STATES OF AMERICA)	
v.)	Case. No. 21-287-1 (TNM)
)	
KEVIN SEEFRIED)	
)	
Defendant.)	
)	

DEFENDANT'S MOTION TO DELAY REPORT DATE

Defendant Kevin Seefried respectfully moves this Court to issue an Order permitting him to delay the date by which he must report to the Bureau of Prisons to a date after April 30, 2023 so that he may attend his grandson's fourth birthday celebration. Mr. Seefried's motion for bond pending appeal is pending before this Court. ECF. No. 146. This Motion seeks delay of his report date irrespective of the Court's ruling on ECF. No. 146 and counsel will withdraw the instant Motion should the Court grant release pending appeal. In support of this Motion, counsel state:

- On February 9, 2023, this Court sentenced Mr. Seefried to an aggregate term of 36 months followed by 12 months of supervised releases for offenses arising out of January 6, 2023.
- 2. On March 2, 2023, Mr. Seefried was notified that he must report to the Bureau of Prisons on March 30, 2023, to begin his sentence.
- 3. As described in undersigned's sentencing submissions, Mr. Seefried shares a special bond with his three-year-old grandson. His grandson stays with him every other weekend and calls affectionately refers to Mr. Seefried as "paw

paw." Mr. Seefried's daughter described how her son feels about Mr. Seefried in her letter to the Court. ECF. No. 136 -1.

- 4. Mr. Seefried's grandson turns four in April and his daughter has arranged a birthday party on April 22, 2023.
- 5. Mr. Seefried moves the Court for an Order delaying his report date so that he can attend his grandson's birthday celebration.¹

Conclusion

For these reasons, Mr. Seefried respectfully moves the Court to delay the date by which he must report to the Bureau of Prisons to after April 22, 2023.

Respectfully Submitted,

A. J. KRAMER

Federal Public Defender for the District of Columbia

by:_____s/__ Elizabeth Mullin Eugene Ohm Assistant Federal Public Defenders 625 Indiana Avenue, NW Washington D.C. 20004 202 208-7500

¹ Should the Court grant Mr. Seefried's motion to remain on bond pending appeal, counsel will withdraw this Motion as moot.