

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, :
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 :
 v. : **Cr. No. 21-cr-305 (JEB)**
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 SARA CARPENTER, :
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 Defendant. :
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UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING DATE

Sara Carpenter, through undersigned counsel, respectfully moves the Court to continue the Sentencing Hearing in this matter from September 13, 2023, to December 19, 2023, so that newly-appointed undersigned counsel has sufficient time to familiarize herself with discovery, the trial record, and Ms. Carpenter’s history and characteristics, in order to prepare for sentencing. In support of this Motion, counsel states:

1. Sara Carpenter is pending sentencing having been convicted by a jury of offenses stemming from her participation in the events at the U.S. Capitol on January 6, 2021.
2. Initially, attorneys from the Office of the Federal Public Defender for the Eastern District of New York were appointed to represent Ms. Carpenter and represented Ms. Carpenter at trial.
3. Trial commenced on March 6, 2023, and concluded on March 9, 2023. Sentencing was set for July 14, 2023. Subsequently, the Court granted

defense counsel's motion to continue and set the sentencing on September 13, 2023. Minute Order, 6/21/2023.

4. On July 12, 2023, trial counsel filed a motion to withdraw citing an unresolvable breakdown in communication. ECF. No. 106. The Court granted the Motion and held deadlines for objections to the PSR and sentencing submissions in abeyance until such time as new counsel has an had opportunity to meet with Ms. Carpenter and confer with the government. ECF. No. 107.
5. Ms. Carpenter's case was assigned to undersigned counsel on or about July 26, 2023. Undersigned counsel will need to review the trial transcripts, pertinent discovery, and speak with Ms. Carpenter and her family in order to prepare for sentencing. In light of undersigned counsel's trial schedule and caseload, counsel is unable to effectively prepare for sentencing by September 13, 2023.
6. Counsel has consulted with the government and chambers. It appears the Court and government is available on December 19, 2023, for sentencing. Accordingly, undersigned counsel moves the Court to schedule the sentencing on December 19, 2023, and order that objections to the Pre-Sentence Report be submitted by November 17, 2023, and sentencing submissions be submitted by December 12, 2023.
7. The government does not oppose this request.

Wherefore the reasons herein, Sara Carpenter, through counsel, respectfully moves the Court to set the above-captioned matter down for sentencing on December 19, 2023.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

_____/s/_____
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