

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

UNITED STATES OF AMERICA

v.

SAVANNAH DANIELLE MCDONALD

Case No.: 1:21-cr-00429-CRC-1

**JOINT MOTION TO RESCHEDULE SENTENCING
AND TO ALLOW SENTENCING TO TAKE PLACE VIA VIDEO TELECONFERENCE**

COME NOW THE PARTIES, by and through undersigned counsel, and jointly move the court for relief on two issues. First, to reschedule the sentencing hearing. Second, to allow the sentencing hearing to take place via video teleconference. (VTC). In support, the parties show as follows:

(1)

Ms. McDonald was charged by way of criminal complaint on May 20, 2021. (Doc.1) She made her initial appearance in the Middle District of Georgia, where proceedings under Rule 5 were conducted, she was released pursuant to a \$25,000 unsecured bond, conditions of pretrial release were imposed, and the case removed to the District of Columbia District Court. (Doc.39) She was charged by an information filed June 24, 2021. (Doc.7) She made her initial appearance on June 25, 2021, via VTC, entered her plea of not guilty, and was allowed to remain on pretrial release under certain conditions of release. (Doc.12) On January 18, 2022, Ms. McDonald entered a negotiated change of plea, pleading guilty to Count IV of the information pursuant to a written plea agreement. (1/18/2022 text entry, Doc.'s 36-38) Following her change of plea, the court set the sentencing date for April 19, 2022, and indicated it would entertain a request that

the sentencing take place via VTC rather than in person. (1/18/2022 text entry, 2/8/2022 text entry)

(2)

The parties now jointly move this court to reschedule the sentencing hearing from its currently scheduled date of April 19, 2022. AUSA Benjamin Kringer noticed his appearance for the government on January 18, 2022. (Dpoc.35) AUSA Kringer will be out of the office April 6-18, 2022. His absence will limit his ability to prepare meaningfully for a sentencing hearing to be held on April 19, 2022. In order to ensure the government has time to prepare fully for Ms. McDonald's sentencing hearing, the parties jointly request that the court reschedule the hearing to a later date.¹

(3)

The parties also jointly move this court to allow the sentencing hearing to take place via VTC. As the court is aware, Ms. McDonald and her counsel are located in the Middle District of Georgia. Ms. McDonald has made all court appearances in the District of Columbia via VTC since the inception of this case. She has always been on-time and without technological problems during those appearances. Following the events of January 6, 2021, Ms. McDonald was forced to change jobs and is making substantially less money than she was prior to January 6, 2021. She lives at home with her parents now while she works, saves money, and tries to find a better job. Although she stands ready to do so if required, traveling to the District of Columbia for an in-person sentencing hearing would be financially difficult for her. Because she has been in all aspects prompt and conducted herself appropriately when before this court for VTC

appearances, allowing her to appear via VTC at her sentencing is not likely to cause any difficulty for the court or the government.

WHEREFORE, the parties respectfully and jointly move this court to grant the relief requested, issue an order rescheduling the sentencing hearing and allowing it to take place via VTC.

Dated this 8th day of February 2022.

Respectfully submitted,

/s/ Timothy R. Saviello

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¹ The parties understand that Ms. McDonald's co-defendant, Mr. Kidd, is set to be sentenced May 9, 2022, and that the court appears to have available time on its calendar either on May 9 or May 10, 2022. Counsel for both parties are available on those dates, as well as May 11 and May 12, respectively.

CERTIFICATE OF SERVICE

I, Timothy R. Saviello, hereby certify that I electronically filed the foregoing with the clerk of Court using the CM/ECF system which will send notification of such to all counsel of record.

/s/Timothy R. Saviello

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