## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Case No.: 1:21-cr-00488-CRC-1

v.

NOAH BACON,

DEFENDANT'S UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

Defendant.

COMES NOW, Noah Bacon, by and through undersigned counsel, to respectfully request this Honorable Court to continue the Sentencing Hearing in this matter until late July or later. As grounds for this motion counsel would state:

- 1. Trial in this matter is scheduled for June 14, 2023.
- 2. The defendant's family wishes to be present for the sentencing hearing.
- 3. The defendant's sister is scheduled to appear in court in Massachusetts the week of June 12, 2023, and the defendant and his family are desirous of attending that proceeding.
- 4. The Massachusetts matter was scheduled prior to the defendant's sentencing hearing.
  - 5. The United States does not oppose this motion.

United States v. Noah Bacon Case No. 1:21-cr-00488-CRC

Defendant's Unopposed Motion to Continue Sentencing Hearing

Law Office of J.R. Conte 8251 NW 15<sup>th</sup> Ct. Coral Springs, FL 33071 Phone: 202.236.1147 Email: dcgunlaw@gmail.com

Joseph R. Conte

Case 1:21-cr-00488-CRC Document 75 Filed 03/17/23 Page 2 of 2

6. Counsel for the United States has advised that he is not unavailable

late June into early July.

WHEREFORE counsel respectfully requests that this motion be

granted.

Dated: March 17, 2023

Respectfully Submitted,

Joseph R. Conte Counsel for Noah Bacon Law Office of J.R. Conte 8251 NW 15<sup>th</sup> Ct.

Coral Springs, FL 33071 Phone: 202.236.1147

Email: dcgunlaw@gmail.com