

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

UNITED STATES OF AMERICA

Plaintiff,

v.

CASE NUMBER: 21-CR-524

NICHOLAS JAMES BROCKHOFF,

Defendant.

_____ /

**MOTION FOR CONTINUANCE OF SENTENCE SCHEDULED FOR MARCH
24, 2023**

1. The Defendant entered a plea on October 27, 2023,
2. The Defendant has a sentencing scheduled for the March 24, 2023.

submitted the same.

3. At the time of the plea, Mr. Brockhoff was located at the Northern Neck Regional Jail.

4. At the plea, the Court established deadlines for various steps in the sentencing process.

5. The Presentence final report was due January 27, 2023. The Government's Memorandum was due February 10, 2023, the defense's due on March 10, 2023. The Sentencing was set for March 24, 2023.

6. The parties scheduled a PSI interview date which was unfortunately missed by the undersigned due to a court conflict.

7. When the Defendant was transferred from Northern Neck to Lewisburg FCI, Mr. Brockhoff missed his PSR interview (the interview was scheduled the same day He was transferred out of the jail).

8. The interview was reset for January 17, 2023.

9. The interview was completed Wednesday, January 17, 2023.

10. Due to this delay, the parties cannot comply with the respective timeline established by the Court.

11. The parties need a reset of the respective due dates due to the delay of completing the PSI interview.

12. What is being suggested is disclose the report on February 2, 2023. With the parties objections due March 7, 2023, and a final report due on March 21, 2023.

13. This changes the timeline for the parties sentencing memorandum due Dates, and the Court can establish those timelines as it sees necessary.

14. The continuance is not being sought for purposes of delay nor for the purpose of being unduly burdensome.

15. At the time of preparation of this Motion, and in accordance with the Local Rules of the District of Columbia, the undersigned contacted Ms. Sches nol, Assistant United States Attorney. Her position, at the time of filing, is he does NOT object to a reset of the timeline and a continuance of the sentencing.

This Court should note, the Government is NOT available and needs protection from April 26, 2023 through May 24, 2023.

RELIEF REQUESTED

WHEREFORE, Defendant, NICHOLAS BROCKHOFF, and the undersigned attorney, requests that a continuance be granted in this cause and this grant any and all other relief deemed equitable and fair by this Honorable Court.

Respectfully Submitted,

/S/ ALEX R. STAVROU, ESQ.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Continue Trial was filed with the Clerk of the Court and was sent via U.S. Mail and ECM to the Assistant United States Attorney, Ms. Schesnol, Esquire, on this 18th day of January, 2023.

/S/ ALEX R. STAVROU, ESQ.

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