Nicole Owens
FEDERAL PUBLIC DEFENDER
FEDERAL DEFENDER SERVICES OF IDAHO
702 West Idaho Street, Suite 1000
Boise, Idaho 83702

Telephone: (208) 331-5500 Facsimile: (208) 331-5525

Attorneys for Defendant YVONNE ST CYR

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA (HONORABLE JOHN D. BATES)

UNITED STATES OF AMERICA,	) 1:22-cr-00185-JDB
Plaintiff,	<ul><li>) UNOPPOSED MOTION TO</li><li>) CONTINUE SENTENCING</li></ul>
vs.	)
YVONNE ST CYR,	) )
Defendant.	)
	)

Yvonne St. Cyr respectfully asks the Court to continue her sentencing hearing, which is currently scheduled for June 9, 2023, to September 12, 2023. The motion is unopposed by the government.

Ms. St Cyr needs additional time to complete the defense mitigation investigation. This case involves an unusually large number of complex mitigation issues and records, and it therefore requires significant research,

Case 1:22-cr-00185-JDB Document 97 Filed 04/24/23 Page 2 of 3

time, and expertise to work up. This additional time should be sufficient to

complete these tasks.

This Motion is brought in good faith and not for any purpose of improper

delay. Given that Ms. St Cyr has been found guilty, there are no speedy trial

issues raised by this motion. However, to the extent she has a right to a

speedier sentencing, Ms. St Cyr waives that right in connection with this

motion. The government does not object.

Accordingly, Ms. St Cyr respectfully requests the Court to continue her

sentencing to September 12, 2023.

Dated: April 24, 2023

Respectfully submitted,

NICOLE OWENS

FEDERAL PUBLIC DEFENDER

By:

-2-

/s/ Nicole Owens

Nicole Owens

Federal Defender

Federal Defender Services of Idaho

Attorneys for Defendant

YVONNE ST CYR

## CERTIFICATE OF SERVICE

I CERTIFY that I am an employee of the Federal Defender Services of Idaho, and that a copy of the foregoing document, UNOPPOSED MOTION TO CONTINUE SENTENCING, was served on all parties named below on this 24th day of April, 2023.

Jacqueline Schesnol, Assistant U.S. Attorney	Hand Delivery
Capitol Riot Detailee	United States Mail
Two Renaissance Square	X CM/ECF Filing
40 N. Central Ave., Suite 1800	Email Transmission
Phoenix, AZ 85004-4449	
(602) 514-7500	
Jacqueline.schesnol@usdoj.gov	

Dated: April 24, 2023 /s/ Joy Fish
Joy Fish