

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

**UNITED STATES OF AMERICA**

**v.**

**CYNTHIA BALLENGER, and  
CHRISTOPHER PRICE,**

**Defendants.**

**Case No. 1:21-cr-00719 (JEB)**

**DEFENDANT CYNTHIA BALLENGER'S (PRICE'S) UNOPPOSED MOTION FOR  
LEAVE TO FILE A MEMORANDUM RELATED TO THE SENTENCING HEARING**

Comes now Defendant Cynthia Ballenger (Cynthia Price), by and through undersigned counsel, respectfully requests to supplement the record for the Sentencing Hearing of September 29, 2023 or, if more technically appropriate, to supplement the case record with material related to the hearing. The Defense has consulted with the Government, and the Government does not object to this motion.

As further discussed in the attached memorandum the effort is to make sure the record is complete, and that the Defense had an opportunity to respond on the record to new allegations contained entirely from a section of the Government Sentencing Memorandum for Cynthia Ballenger (Price) styled "Ballenger's Trial Testimony". The opportunity may be relevant to issues on a potential appeal. As discussed in the attached memorandum, the Defense did not have the opportunity to respond to these allegations at the Sentencing hearing.

Dated: October 5, 2023

Respectfully submitted,

/s/ Nandan Kenkeremath

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