

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

UNITED STATES OF AMERICA,)	Docket No. 1:21-cr-00025
)	
)	
v.)	ELECTRONICALLY FILED
)	
JORDEN MINK,)	The Honorable Randolph D. Moss
)	
Defendant.)	

**MOTION TO CONTINUE OBJECTIONS TO THE PRESENTENCE REPORT,
SENTENCING MEMORANDUM, AND SENTENCING HEARING**

And now, to-wit, comes the Defendant, Jordan Mink (hereinafter “Mr. Mink”), by and through his counsel, Komron Jon Maknoon, and respectfully submits the within Motion to Continue Objections to the Presentence Report, Sentencing Memorandum, and Sentencing Hearing. In support thereof, he avers as follows:

1. On January 27, 2021, Mr. Mink was indicted on alleged violations of 18 U.S.C. §§ 1512(c)(2) and 2, 18 U.S.C. §§ 641 and 2, 18 U.S.C. § 1361, 18 U.S.C. § 1752(a)(1) and (b)(1)(A), 40 U.S.C. § 5104(e)(2)(D), 40 U.S.C. § 5104(e)(2)(F), and 40 U.S.C. § 5104(e)(2)(G) (*See* ECF Doc. No. 5).
2. On February 24, 2021, a superseding indictment was issued with the same alleged violations, but with the addition of alleged violations of 18 U.S.C. § 231(a)(3), 18 U.S.C. 111(a)(1) and (b), and 18 U.S.C. § 111(a)(1) (*See* ECF Doc. No. 7).
3. On January 25, 2022, undersigned counsel respectfully entered his appearance on behalf of Mr. Mink (*See* ECF Doc. No. 48).

4. On January 17, 2023, a Change of Plea hearing was held, and Mr. Mink pleaded guilty to counts two (2) and nine (9) (*See* ECF Doc. No. 77).

5. Currently scheduled and due are Objections to the draft Presentencing Report on March 21, 2023, Sentencing Memoranda on April 7, 2023, and Sentencing in this matter is scheduled for April 11, 2023 (*See* ECF Doc. No. 77).

6. The Washington, D.C. Correctional Treatment Facility, currently enforces a policy of only allowing attorney-client legal video conferences (via “DOC WebEx”) on Fridays, which has hindered undersigned counsel’s ability to schedule a meeting with Mr. Mink to discuss the draft Presentencing Report.

7. Additionally, undersigned counsel has faced difficulties with regard to receiving waivers considering the lengthy outgoing mail process established by the jail, and undersigned counsel is still in the process of gathering HIPAA waivers, medical records, and letters to provide to Sherry Baker from the United States Probation Office and to supplement the sentencing memorandum.

8. On March 20, 2023, Assistant United States Attorney Nialah Ferrer informed undersigned counsel that she consents to the relief sought within and for sentencing to be continued for forty-five (45) days.

WHEREFORE, Mr. Mink respectfully requests that this Honorable Court grant the Motion to Continue Sentencing for forty-five (45) days, or a date deemed more appropriate by this Court as well as the respective date of the Objections to the Presentence Report and Sentencing Memorandum accordingly.

Respectfully submitted,

/s/ Komron Jon Maknoon
Komron Jon Maknoon, Esquire
PA I.D. No. 90466

Maknoon & Associates, LLC
309 Smithfield St., 4th Floor
Pittsburgh, PA 15222
(412) 201-1802
(412) 774-8424 FAX