

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

\*

vs.

\* Case No.: 22-cr-00243-CKK

COLE ANDREW TEMPLE

\*

Defendant

\*

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**CONSENT MOTION TO CONTINUE SENTENCING HEARING**

COMES NOW, the Defendant Cole Andrew Temple, by and through counsel, Michael E. Lawlor, and Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to continue the sentencing hearing currently scheduled for Monday, June 5, 2023. In support of this Motion, counsel states the following:

1. Per prior Order of the Court, Mr. Temple is scheduled to appear before this Honorable Court on Monday, June 5, 2023 for sentencing in the above-referenced case.

2. Undersigned counsel respectfully asks for a brief continuance of the sentencing hearing by approximately 1-2 weeks for the following reasons:

- a. The parties are scheduled to appear for day one of a carryover trial in the Circuit Court for Baltimore City in the matter of *State of Maryland v. Amber Robinson Bijou*; case no: 122347001 beginning Monday, June 5, 2023 at 9:00a.m.

3. Undersigned counsel has discussed this request with Mr. Temple, and is authorized to state that he is in agreement with the instant request.

4. Undersigned counsel has also contacted Assistant United States Attorney Anita Eve, and is authorized to state that the United States does not oppose this motion.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests this Honorable Court continue the sentencing hearing scheduled on Monday, June 5, 2023 for a period of approximately 1-2 weeks on a date that is convenient to the Court and all parties

Respectfully submitted,

/s/

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#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 30, 2023, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Columbia.

/s/

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Michael E. Lawlor