

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-623-1 (CRC)
	:	
MICHAEL ECKERMAN,	:	
	:	
Defendant.	:	

UNOPPOSED MOTION TO CONTINUE SENTENCING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby moves this Court for a two-week continuance in the above-captioned matter until the week of February 27, 2023, or after March 20, 2023, whichever is more convenient for the Court.¹ Government counsel has conferred with defense counsel, who has confirmed that the defendant does not oppose this request.

In support thereof, the government states as follows:

1. This matter is currently set for sentencing on February 14, 2023, with sentencing memoranda due on February 7, 2023.
2. The parties received the draft presentence investigation report (“PSR”) from the Probation Office on January 10, 2023.
3. For the past few months, the government’s attorneys have been diligently preparing for trial in the co-defendant matter, *United States v. Kirstyn Niemela*, 21-cr-623-2, while one of them has been conducting jury trials in this District beginning on November 7, 2022 (*United States v. Riley Williams*, 21-cr-618; concluding on November 21, 2022) and January 9, 2023 (*United States v. Barnett*, 21-cr-38; ongoing). Accordingly, the

¹ The parties are also available the first week of March 2023, if that week is more amenable to the Court.

government team has been delayed in its preparations for sentencing in this case, including drafting its sentencing memorandum.

4. The United States respectfully requests a short two-week continuance of sentencing not for strategic delay but rather to ensure that the government team may have sufficient time to consider the PSR, consult with supervisors, and draft a thoughtful recommendation, supported by fully developed reasoning, that will best assist the Court in reaching its sentencing determination.

In light of the above and the defendant's consent, the government respectfully requests that the Court continue sentencing in this matter for two weeks until the week of February 27, 2023, or thereafter as convenient to the Court.² A proposed order is attached.

Respectfully submitted,

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² Government counsel is not available, however, between March 12-20, 2023.