

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

UNITED STATES OF AMERICA

v.

DONNIE DUANE WREN

Defendants.

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Case No. 21CR00599-RBW

**DEFENDANT WREN'S UNOPPOSED MOTION TO CONTINUE
SENTENCING**

The Defendants, **DONNIE DUANE WREN**, by and through undersigned counsel, moves this Honorable Court to enter its order continuing the sentencing in the above captioned matter and as grounds states the following:

1. This matter is currently scheduled for sentencing on **Thursday, August 17, 2023**. Mr. Wren's Motion for New Trial and Motion for Acquittal are also scheduled that day.

2. Undersigned counsel is attempting to schedule a family vacation to Cadiz, Spain, the birthplace of his wife's family. This same trip was cancelled last year due to counsel's brother-in-law's cancer diagnosis (and ultimate passing) and the only time available prior to counsel's youngest daughter returning to her studies at UPenn on August 20, is the third week of August.

3. Undersigned counsel can assure the Court that absent the most extraordinary of circumstances, counsel for the Defendant will make himself available,

and be prepared to move forward on all pending matters, on whatever new date the Court so chooses.

4. Prior to filing the instant motion, undersigned counsel conferred with counsel for the co-Defendant, Greg Park, who has no objection. Moreover, undersigned conferred with counsel for the government, Victoria Sheets, who also has no objection. Ms. Sheets requested that, if continued, the new date be set after August 31, 2023.

5. This motion is being made in good faith and is not interposed for the purposes of unnecessary delay.

WHEREFORE, the Defendant respectfully requests that this Honorable Court grant this motion and enter its order vacating the August 17, 2023, date for motions and sentencing and extending the deadline for PSR objections and Sentencing Memorandum in accordance with the applicable rules.

CERTIFICATE OF SERVICE

I certify that on this 13 day of July 2023, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing.

Respectfully submitted,

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