

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

UNITED STATES OF AMERICA)
)
)
v.)
)
LUCAS DENNEY)
)
Defendant)
)

Case No. 22-cr-00070

JOINT MOTION TO VACATE SENTENCING DATE AND CONTINUE SENTENCING

William L. Shipley, Jr., Esq.
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Attorney for Defendant

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA UNITED STATES OF AMERICA))) v.)
 Case No. 22-cr-00070) LUCAS DENNEY)) Defendant)) JOINT MOTION TO VACATE SENTENCING DATE AND
 CONTINUE SENTENCING William L. Shipley, Jr., Esq. PO Box 745 Kailua, Hawaii 96734 Tel: (808) 228-1341
 Email: 808ShipleyLaw@gmail.com Defendant /s/ William L. Shipley, Jr., Esq. PO BOX 745 Kailua, Hawaii 96734 Tel: (808) 228-1341 Email: 808ShipleyLaw@gmail.com
 Defendant Lucas Denney and the
 United States of America, by and through undersigned counsel, and respectfully requests this Honorable Court
 through undersigned counsel, and respectfully requests this Honorable Court to vacate the
 current sentencing hearing scheduled to take place on June 9, 2022, at 2:00 pm.
 to vacate the current sentencing hearing scheduled to take place on June 9, 2022, at 2:00 pm. The Parties jointly
 request that the Sentencing Hearing be rescheduled for July 13, 2022, at 9:00 am, and allow a full day if possible
 to conduct the sentencing hearing. It is likely that a evidentiary hearing may be requested by one or both parties
 to resolve objections at the time of sentencing. WHEREFORE, the defendant, Lucas Denney, and the United
 States of America move this Honorable Court to vacate the current scheduled sentencing hearing and continue it
 to July 13, 2022. Dated: May 8, 2022 Respectfully submitted, /s/ William L. Shipley William L. Shipley, Jr., Esq.
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 Defendant /s/ Benet J. Kearney Jennifer M. Rozzoni NM Bar No. 14703 Benet J. Kearney NY Bar No. 4774048
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evidentiary hearing may be requested by one or both parties to resolve objections at the time of
 sentencing.

WHEREFORE, the defendant, Lucas Denney, and the United States of America move
 this Honorable Court to vacate the current scheduled sentencing hearing and continue it to July
 13, 2022.

Dated: May 8, 2022

Respectfully submitted,

/s/ William L. Shipley
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