

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 21-cr-693 (TFH)</b>
	:	
<b>MARK KULAS,</b>	:	
	:	
<b>Defendant.</b>	:	

**UNOPPOSED MOTION FOR CONTINUANCE**

The United States of America hereby respectfully submits this unopposed motion for a continuance of the sentencing hearing date and the deadline for submission of memoranda in aid of sentencing.

The sentencing hearing is currently scheduled for March 7, 2022, with sentencing memoranda due to be filed on February 28, 2022. The parties have not yet received the final Presentence Investigation Report or the sentencing recommendations from the Probation Office. The United States has determined that additional factual investigation on matters raised in the draft Presentence Investigation Report would help clarify issues relevant to the government's sentencing recommendation and would help ensure that the Court is fully informed of the facts before imposing sentence. It is in the interest of justice for the parties and the Court to have the benefit of additional information prior to the sentencing hearing.

It would accordingly be appropriate and in the interests of justice to continue the sentencing hearing to the week of April 25, 2022, at the convenience of the Court, and to require that memoranda in aid of sentencing be filed one week prior to the sentencing date.

The defendant has no objection to this request.

Respectfully submitted,

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By:                     /s/                      
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	:	
<b>Defendant.</b>	:	

**PROPOSED ORDER**

Having considered the motion for a continuance of the sentencing hearing, and having determined that there is good cause to grant the unopposed motion, it is hereby ORDERED that the motion be, and hereby, is GRANTED.

The sentencing hearing is scheduled for \_\_\_\_\_, and the parties are to submit any memoranda in aid of sentencing by one week prior to the sentencing hearing.

IT IS SO ORDERED.

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Hon. Thomas F. Hogan  
United States District Judge