

**UNITED STATES OF AMERICA
WESTERN DISTRICT OF NEW YORK**

0090 1:21CR00334-003

UNITED STATES OF AMERICA

**UNOPPOSED MOTION
TO CONTINUE
SENTENCING HEARING**

v.

KATHARINE MORRISON

Defendant, Katharine Morrison, by and through undersigned counsel, submits this motion to continue her sentencing hearing, currently scheduled for January 20, 2023. The defense respectfully requests that Ms. Morrison's sentencing hearing be rescheduled for February 24, 2023, the same date upon which codefendant Tara Stottlemeyer is currently scheduled to be sentenced.

In support of this motion, the defense states:

1. Ms. Morrison recently suffered an injury to her neck and has been experiencing extreme pain. She has met with her primary care physician, as well as various specialists in an effort to discover the source of the pain and treatment options.
2. Ms. Morrison has been prescribed muscle relaxers and is currently awaiting the scheduling of an MRI.
3. At this time, Ms. Morrison has been advised by her medical team that long-distance travel could be detrimental to her health and recovery. *See Exhibit A.*
4. Defense Counsel has conferred with Assistant United States Attorney Anthony Franks. Mr. Franks does not object to the adjournment of Ms. Morrison's sentencing

hearing. The defense further understands that Mr. Franks joins in the request that Ms. Morrison's sentencing hearing be scheduled on the same date as that for Ms. Stottlemyer, February 24, 2023.

Wherefore, this Honorable Court is respectfully requested to continue Ms. Morrison's Sentencing Hearing and to reschedule the matter for February 24, 2023.

Date: January 12, 2023

Respectfully Submitted,

/s/Jeffrey L. Ciccone
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