

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

KATHARINE HALLOCK MORRISON aka
KATE,

Defendant.

Case No. 21-cr-00334-003-TJK

**MOTION TO CONTINUE DATE FOR FILING SENTENCING MEMORANDA AND TO VACATE
DATE SET FOR SENTENCING HEARING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully requests this Court to enter an Order continue the filing of the parties' Sentencing Memoranda in this case until a week prior to the anticipated new date for Sentencing Hearing and to vacate the date set for the currently scheduled Sentencing Hearing. for the reasons stated below:

1. On February 2, 2022, a federal grand jury returned a superseding indictment charging Morrison with Obstruction of an Official Proceeding in violation of 18 U.S.C. § 1512(c)(2), Entering or Remaining in any Restricted Building or Grounds in violation of 18 U.S.C. §§ 1752(a)(1), Disorderly and Disruptive Conduct in a Restricted Building or Grounds in violation of 18 U.S.C. § 1752(a)(2), Disorderly Conduct in a Capitol Building in violation of 40 U.S.C. § 5104(e)(2)(D), and Parading Demonstrating, or Picketing in a Capitol Building in violation of 40 U.S.C. § 5104(e)(2)(G). On October 3, 2022, Morrison pled guilty to Count Three, Obstruction of an Official Proceeding in violation of 18 U.S.C. § 1512(c)(2).
2. Sentencing is set for defendant in this case for February 24, 2023, and Sentencing Memoranda are due for filing tomorrow, February 17th. Defense counsel has informed the Deputy Clerk for

this Court and Government counsel below that it will request a continuance of the Sentencing Hearing based upon medical issues with the defendant and defendant's apparent inability to travel, but counsel is awaiting the receipt of a letter from Defendant's counsel. The parties will request the Court to reset the Sentencing Hearing for March 29, 2023, the date set for the other two defendants in this case, and for Sentencing memoranda to be filed one week prior, March 22, 2023.

3. Defense counsel has not yet filed its Motion to Continue, likely because it has not yet obtained the requested documentation from defendant's physician. Out of an abundance of caution, the Government requests the Court to vacate the date set for the February 24, 2023 Sentencing Hearing and to enter an Order to reset the filing of the parties' Sentencing Memoranda for one-week before the anticipated newly set Sentencing Hearing – March 22, 2023.

WHEREFORE, for the reasons set forth above, the Government requests the Court to vacate the date set for the February 24, 2023 Sentencing Hearing and to enter an Order to reset the filing of the parties' Sentencing Memoranda for one-week before any newly set Sentencing Hearing, which the parties anticipated will be March 22, 2023, depending upon the Court's schedule.

Respectfully submitted,

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