

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

_____)	
)	
UNITED STATES OF AMERICA,)	
)	
v.)	Criminal Action No. 21-CR-178 (APM)
)	
SHELLY STALLINGS, et al.,)	
)	
Defendants.)	
_____)	

**UNOPPOSED MOTION OF SHELLY STALLINGS
TO CONTINUE SENTENCING**

Comes the defendant, Shelly Stallings, by counsel, and moves the Court to continue the sentencing herein currently scheduled for January 13, 2023. As grounds for said motion, the undersigned states that additional time is necessary to review new discovery provided by the United States on December 12, 2022, and discuss same with defendant; review any relevant testimony and exhibits from the recent trial of the co-defendants; respond to the presentence report; complete the sentencing memorandum herein; and counsel and advise defendant in order to provide effective assistance of counsel.

Defendant has remained compliant with the conditions of her bond and has been reporting to her supervising probation officer as directed, timely submitting to all requested drug tests, and attending required mental health and drug abuse evaluations. She continues to be employed in Henderson, Kentucky, as a forklift driver, from 3:00 pm to 11:00 pm. She

is scheduled to have major surgery on February 2, 2022, and advises counsel that she it will be medically inadvisable for her to work or travel for 4 to 6 weeks thereafter.

The undersigned has been authorized by the United States to represent to the Court that it has no objection to the granting of this motion.

/s/ Scott T. Wendelsdorf (Ky. Bar. No. 75790)
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Counsel for Defendant.

CERTIFICATE

I hereby certify that on December 27, 2022, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Scott T. Wendelsdorf