

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

UNITED STATES OF AMERICA

*

vs.

*

Case No.: 22-cr-00338 DLF

TRACI ISAACS

*

Defendant

*

UNOPPOSED MOTION TO CONTINUE SENTENCING

The Defendant, Traci Isaacs, by and through counsel, Michael E. Lawlor, Nicholas G. Madiou and Brennan, McKenna & Lawlor, Chtd., hereby moves this Honorable Court to continue sentencing in this matter. In support of this Motion, counsel states as follows:

1. Per prior order of the Court, sentencing in this matter is scheduled for Wednesday, November 8, 2023 at 10:00 a.m.

2. At this time, undersigned counsel respectfully requests that this Court continue the sentencing in this matter because the defendant's mother passed away on October 18, 2023. The defendant has been the sole caretaker for her mother for the last eight months and she is the person that will be handling all of her mother's affairs and funeral arrangements.

3. Undersigned counsel is requesting that the sentencing in this matter be continued by approximately 90 days to a date acceptable to the Court and all parties in order for Ms. Isaacs to get her mother's affairs in order.

4. This Motion is unopposed. The undersigned counsel contacted Assistant United States Attorney Kyle McWaters, who has indicated that the Government **does not oppose** this request.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests that this Honorable Court continue the sentencing in this matter by approximately 90 days to a date acceptable to the Court and all parties.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 19, 2023, a copy of the foregoing was sent to the United States Attorney's Office for the District of Columbia, via ECF.

/s/

Michael E. Lawlor