

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

<b>UNITED STATES OF AMERICA</b>	)	
	)	
	)	
<b>v.</b>	)	<b>Case No. 21-cr-00738-BAH</b>
	)	
<b>MICHAEL OLIVERAS</b>	)	
	)	
	)	
<b>Defendant</b>	)	
	)	

**DEFENDANT MICHAEL OLIVERAS' UNOPPOSED MOTION TO  
CONTINUE SENTENCING AND EXTEND ALL FILING DEADLINES**

NOW comes Defendant Michael Oliveras by and through his counsel of record William L. Shipley Jr., and respectfully requests this Honorable Court to continue the Sentencing Hearing and all filing deadlines regarding sentencing.

On January 27, 2023, Defendant Oliveras accepted and entered into a plea agreement on for a violation of 18 U.S.C. 111(a). *See* ECF. No 59.

On that same date this Court set Defendant Oliveras' Sentencing Hearing for April 21, 2023 at 10:00 am. *See* 01/27/2023 Minute Entry.

On April 11, 2023, Defendant Oliveras retained undersigned counsel, William L. Shipley, as his counsel for the purpose of sentencing. Undersigned counsel filed a notice of appearance the same day. *See* ECF. No. 68.

Mr. Olivares new counsel requests this continuance in order to become familiar with the factual background of the case, to consult with Mr. Olivares regarding a Sentencing Statement, and to prepare to effectively represent him at the Sentencing Hearing.

Based thereon, Defendant Oliveras respectfully asks this Court to vacate the Sentencing Hearing set for April 21, 2023, and to reset the Sentencing Hearing the first week of June 2023 or whatever date thereafter is available on the Court's calendar.

Undersigned counsel did discuss this matter with Government Counsel

Ashely Akers by telephone, and the Government does not oppose Attorney Shipley's late entry into the case or the requested continuance.

Dated: April 12, 2023

Respectfully Submitted,

/s/ William L. Shipley  
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