

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)

V.)

KATELYN BARTOW,)

Defendant.)

Case No. 1:22-CR-358-RC

DEFENDANT’S MOTION TO CONTINUE SENTENCING

Ms. Bartow, the defendant, respectfully moves for an order continuing the sentencing hearing scheduled for December 1, 2023, to a date at some time in January 2024. On July 20, 2023, Ms. Bartow pleaded guilty to one misdemeanor count of demonstrating, picketing or parading in a Capitol building, as part of a plea agreement with the Government. She has remained on pre-trial release with no issues. This is the first request for a continuance of the sentencing hearing.

The primary reason for the request is that defense counsel has a bribery and corruption trial scheduled to begin on December 4, in New York. As such, I will need to devote the preceding days and weeks almost exclusively to preparation for that complex trial. I cannot adequately represent both my client in that proceeding, as well as appear for sentencing on behalf of Ms. Bartow in this matter in Washington, D.C. Further, this is a hearing where we prefer to be present in the courtroom with Your Honor, necessitating travel from New York, as opposed to proceeding by video, as we have done up till now. And it is a hearing where I feel I must be present, as opposed to asking a colleague to handle it for me.

Continuing the sentencing for a modest period of time will also allow the Probation Officer to continue working on the PSR, will permit Ms. Bartow to complete any remaining forms or

disclosures, and will allow defense counsel to further assemble substantial mitigation materials on her behalf relevant to sentencing. I have consulted with AUSA Andrew Haag on behalf of the Government, who consents to an adjournment of Ms. Bartow's sentencing. For these reasons, we respectfully ask for an adjournment of sentencing for approximately 45 days, at the Court's convenience, as well as resetting sentencing-related deadlines in accordance with the proposed new date for the hearing

We thank the Court for its consideration and look forward to our next appearance and resolution of this matter.

October 18, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that in filing the above document electronically, I have caused notification to be made upon opposing counsel for the United States, and all parties.

/s/ Jeremy B. Sporn