

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
 v.)
)
)
)
)
EDWARD BADALIAN)

CRIMINAL NO. 21-cr-246 (ABJ)

OPPOSED MOTION TO CONTINUE SENTENCING HEARING

Edward Badalian, through his Attorney, Robert M. Helfend, respectfully requests this Court continue Mr. Badalian’s sentencing hearing from September 8, 2023, to September 26, 2023, September 22, 2023, October 27, 2023, October 30, 2023, or October 31, 2023.

This Motion is necessary for the effective preparation of Mr. Badalian’s Sentencing Memorandum.

Mr. Badalian’s Presentence Report was disclosed on August 14, 2023. The Parties’ Sentencing Memorandums are due to the Court by August 28, 2023. 2 weeks is not adequate time to research the various legal theories underlining Probation’s finding of Sentencing Enhancements under 2J1.2, as well as review the Probation Report and Mr. Badalian’s proposed draft Sentencing Memorandum with Mr. Badalian.

After consulting with the Government, the Government objects to a continuance. The Government has conflicts September 28-October 26, and November 13-21 The Government further believes that a continuance over their objection “should only be... to later in September.”

Dated: August 15, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify on the 15th day of August, 2023, a copy of same was electronically filed using the CM/ECF system and thus delivered to the parties of record and in pursuant to the rules of the Clerk of Court.

/s/ Robert Helfend