

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

UNITED STATES OF AMERICA	)	
	)	No. 21 CR 536
v.	)	
	)	
KAROL J. CHWIESIUK & AGNIESZKA CHWIESIUK	)	Hon. Ana C. Reyes
	)	

**DEFENDANTS’ UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING**

The Defendants, Karol J. Chwiesiuk and Agnieszka Chwiesiuk, by and through their attorneys, Nishay K. Sanan and Cece White, respectfully moves this Honorable Court to continue the sentencing date and associated filing deadlines. In support, the Defendants state the following:

1. This matter is currently set for sentencing on December 8, 2023 at 9:00 a.m. This is the first request for a continuance by either party.
2. A draft PSR was released on November 2, 2023. Dkt. 119. The parties’ objections to the PSR and sentencing memoranda are due by local rule 14 days after the receipt of the PSR on November 16, 2023.
3. The Defendants’ post-trial motion is currently pending (Dkt. 117), with the government having recently filed a response on October 27, 2023. Dkt. 118.
4. Defense counsel is scheduled for jury trial in the Northern District of Illinois on December 11, 2023 in *United States v. Izsak*, Case No. 19-CR-582. The trial is expected to be lengthy and the presiding judge, the Honorable Manish S. Shah, has asked the parties to accommodate an earlier start date to ensure that the trial will conclude prior to the holidays for the convenience of both the Court and the jurors.
5. Specifically, the Court has requested that the parties attempt to continue any

scheduling conflicts to allow jury selection to take place on December 7 and December 8, 2023. For this reason, defense counsel would be engaged in trial and unavailable to travel to the District of Columbia on the currently scheduled sentencing date of December 8, 2023.

6. As such, the Defendants request a continuance of the sentencing hearing, as well as the associated deadlines for filing objections to the presentence report and memoranda.
7. The government has no objection to this motion.
8. Should this motion be granted, the defense and the government are available for the sentencing hearing to take place on a convenient date for the Court between January 22, 2024 and January 26, 2024.
9. The defendants further request that the deadline for filing be set for 2 weeks before the sentencing hearing is scheduled to take place.

For these reasons, the Defendants, Karol J. Chwiesiuk and Agnieszka Chwiesiuk, respectfully request that the Court enter an order continuing the current date for sentencing, as well as the deadlines for the presentence report and sentencing memoranda.

Respectfully submitted,

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