

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

UNITED STATES OF AMERICA

v.

PATRICK E. MCCAUGHEY III,

Defendant.

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: Case No. 21-CR-40 (TNM)

**DEFENDANT PATRICK E. MCCAUGHEY'S
MOTION TO CONTINUE SENTENCING HEARING**

Defendant Patrick E. McCaughey III (“Mr. McCaughey”) respectfully requests, by and through undersigned counsel, that this Honorable Court continue Mr. McCaughey’s sentencing hearing currently scheduled for January 26, 2023, until late March 2023 or later. Furthermore, Mr. McCaughey respectfully requests that this Honorable Court continue the deadline for submission of sentencing memoranda currently scheduled for January 19, 2023.

Undersigned counsel has recently been retained for the purposes of sentencing and was not counsel for Mr. McCaughey during trial. Therefore, counsel needs additional time to review the case in its entirety. Given the amount of information this case pertains to, defense counsel would like to carefully review the facts and review the evidence with his client to prepare for sentencing.

Furthermore, Mr. McCaughey may call witnesses during the sentencing hearing who have indicated that they will not be available on January 26, 2023.

Counsel for the government, Assistant United States Attorney Kimberly Paschall, has been notified of this request and does not oppose the requested continuances. AUSA Paschall also noted that she will be in trial for two to three weeks starting on February 27, 2023, and we

ask that Mr. McCaughey's sentencing hearing be moved until after Ms. Paschall's trial has concluded.

WHEREFORE, Defendant Patrick E. McCaughey III respectfully requests that this Honorable Court grant his motion and continue the sentencing hearing currently scheduled for January 26, 2023, until late March 2023 or later, as well as continue the deadline for submission of sentencing memoranda currently scheduled for January 19, 2023.

Respectfully Submitted,

/s/ Dennis E. Boyle

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of January 2023, I electronically filed the foregoing with the Court using the CM/ECF system, which sent notification of such filing to all parties.

/s/ Dennis E. Boyle

Dennis E. Boyle