

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CASE NO. 1:21-CR-617-DLF</b>
<b>v.</b>	:	
	:	
<b>PHILIP S. YOUNG,</b>	:	
	:	
<b>Defendant.</b>	:	

**GOVERNMENT’S CONSENT MOTION TO CONTINUE SENTENCING  
MEMORANDUM DATE**

The United States of America, through undersigned counsel, respectfully moves the Court to continue the due date for submission of the Government’s Sentencing Memorandum, currently set for Tuesday, January 24, 2023, to Wednesday January 25, 2023. In support of the Motion, the undersigned represents:

1. The undersigned is out of town (not in the districts of Nebraska or District of Columbia) and has been having significant internet connectivity issues. The issue will be resolved when the undersigned returns home the evening of January 24.
2. Counsel previously consulted with defense counsel to let him know this may be an issue and he indicated he has no objection to the undersigned seeking the extension.
3. Although it was not discussed with the defense counsel, in the interest of fairness, the undersigned has no objection to the defendant having until January 25 to submit his Sentencing Memorandum.
4. Extending the submission date to January 25 should not interfere with the sentencing hearing in this matter currently set for January 31, 2023.

WHEREFORE, the government respectfully requests that this Court grant the motion for a one-day continuance of the date by which the Sentencing Memoranda are due in this matter.

Respectfully submitted,  
MATTHEW M. GRAVES  
United States Attorney  
DC Bar No. 481052

By: /s/ Susan T. Lehr  
SUSAN T. LEHR  
Assistant United States Attorney  
Ne Bar No. 19248  
District of Columbia  
Capitol Riot Detailee  
1620 Dodge Street, #1400  
Omaha, NE 68102  
Telephone: 402-661-3715  
Email: susan.lehr@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that January 23, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties listed on the Electronic Case Filing (ECF) System.

By: /s/ Susan T. Lehr  
SUSAN T. LEHR  
Assistant United States Attorney