

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

UNITED STATES OF AMERICA,	:	
	:	
v.	:	No. 22-cr-00364-APM
	:	
RICHARD J. ESCALERA,	:	
Defendant.	:	

**CONSENT MOTION TO CONDUCT
SENTENCING HEARING BY VTC**

COMES NOW, Allen H. Orenberg, counsel for the defendant, to respectfully requests the entry of an order authorizing the sentencing hearing scheduled for August 4, 2023, (4:00 p.m.) to be conducted by VTC.

1. This Motion is consented to by AUSA Kaitlin Klamann.
2. The sentencing hearing is scheduled for August 4, 2023, at 4:00 p.m.
3. During the plea hearing on April 6, 2023, the Court indicated it would consider conducting the sentencing hearing by VTC, if Mr. Escalera executes and files a waiver of personal presence for the sentencing hearing.
4. Mr. Escalera and counsel have executed a waiver of personal presence, which is attached as an exhibit to this Motion.

WHEREFORE, for the foregoing reasons and such other reasons which may appear just and proper, respectfully requests the entry of an order authorizing the sentencing hearing scheduled for August 4, 2023, (4:00 p.m.) to be conducted by VTC.

Respectfully Submitted,

Allen H. Orenberg, # 395519
The Orenberg Law Firm, P.C.
12505 Park Potomac Avenue, 6th Floor
Potomac, Maryland 20854
Tel. No. 301-984-8005
Cell Phone No. 301-807-3847
Fax No. 301-984-8008
aorenberg@orenberglaw.com

Dated: July 7, 2023

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2023, I served via CM/ECF a copy of the foregoing Consent Motion to Conduct Sentencing Hearing by VTC to case registered parties.

Allen H. Orenberg