

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

UNITED STATES OF AMERICA

v.

**ANDRA SHIRONE THOMPSON,
a/k/a “RICO SERRAS”**

Defendant

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CRIMINAL NO. LKG-24-57

CONSENT MOTION TO CONTINUE

The United States of America, by its undersigned attorney, unopposed by counsel for the Defendant, respectfully moves this Court to continue the sentencing hearing in the above-captioned case to March 18, 2025 at 10:30 a.m. and to reschedule the accompanying briefing deadlines accordingly. In support thereof, the United States sets forth the following:

1. On February 26, 2024, Defendant was charged in an information with two counts of conspiracy in violation of 18 U.S.C. § 371. Dkt. 1. Defendant made his initial appearance, waived indictment, and pleaded guilty to both counts on May 2, 2024. Dkts. 4, 5, & 7.
2. On October 8, 2024, the Court entered a scheduling order, setting Defendant’s sentencing hearing for November 26, 2024 at 10:30 a.m. Dkt. 10.
3. On October 29, 2024, the Court contacted the parties to reschedule the hearing to a new date. After several consultations, all parties and the Court agreed that Tuesday, March 18, 2025 at 10:30 a.m. would be an acceptable date for the sentencing hearing given the parties’ availability and anticipated issues at sentencing.

Accordingly, the Government moves to continue the sentencing hearing in the above-captioned case to March 18, 2025 at 10:30 a.m. and to reschedule the accompanying briefing deadlines accordingly.

Respectfully submitted,

Erek L. Barron
United States Attorney

By: /s/
Joseph L. Wenner
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Consent Motion to Continue, as well as the proposed Order, were filed through the Electronic Case Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/

Joseph L. Wenner

Assistant United States Attorney