

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

CHYNNA SAVATH,
Defendant.

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)
) Criminal No.: 1:21-CR-10269
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ASSENTED-TO MOTION TO CONTINUE SENTENCING HEARING

Defendant Chynna Savath, by and through her undersigned counsel, hereby moves this Court for an Order continuing the sentencing hearing in this matter, currently scheduled for 10 a.m. on June 2, 2022, to a date on or after June 23, 2022. In support of this Motion, undersigned counsel states as follows:

1. In this case, Defendant Savath has plead guilty to two counts of wire fraud pursuant to a plea agreement reached pursuant to Fed. R. Crim. P. 11(c)(1)(C).
2. The sentencing in this matter is currently scheduled for June 2, 2022 at 10 a.m. Until the events of earlier today, Ms. Savath and her counsel were prepared to proceed with the sentencing hearing on that date.
3. Defendant is currently residing in Bronxville, New York. On May 31, 2022, in advance of her planned travel to Boston for the sentencing hearing, she took a COVID-19 test and she tested positive.
4. Upon receipt of her positive COVID-19 test, Defendant promptly notified undersigned counsel as well as the United States Probation Officer that is currently supervising her out of the United States Probation Office for the Southern District of New York.

5. Defendant's COVID symptoms are currently mild, and her physician has informed her that, barring any unexpected complications, she should be cleared to travel within 10 days to two weeks. Defendant is optimistic that she will recover quickly.
6. Counsel for the United States has assented to the relief requested in this Motion.

WHEREFORE, Defendant respectfully requests that this Court continue the sentencing of this matter to a date on or after June 23, 2022.

Respectfully submitted,
DEFENDANT, CHYNNA SAVATH,
By her attorney,

/s/ Daniel J. Cloherty
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I served a true copy of the above document upon all parties with an interest in this matter by electronically filing through this Court's CM/ECF filing system this 31st day of May, 2022.

/s/ Daniel J. Cloherty
Daniel J. Cloherty