

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

UNITED STATES OF AMERICA

v.

Criminal No. 2:22-00205

TIFFANY BOWLIN

MOTION TO CONTINUE PLEA HEARING

The defendant, Tiffany Bowlin, by her attorney, Assistant Federal Public Defender Rachel E. Zimarowski, respectfully requests that this Honorable Court continue the plea hearing and, in support thereof, respectfully represents:

1. By Order entered January 6, 2023, a plea hearing in the above-styled matter was scheduled for January 12, 2023, at 10:00 a.m. before Senior United States District Court Judge John T. Copenhaver, Jr. Dkt. No. 9.

2. By Order entered this date, the plea hearing was continued, sua sponte, to January 13, 2023, at 1:30 p.m. Dkt. No. 11.

3. In preparation for the anticipated plea hearing, the United States Probation Office prepared a pretrial services report recommending that Ms. Bowlin be released on bond under the standard conditions set by this Court.

4. Ms. Bowlin is gainfully employed full-time and supports two minor children as a single mother. Upon receipt of the Order setting the plea hearing, Ms. Bowlin requested the date off through her employer. Her employer denied her request because it requires at least fourteen days of advance notice for approved leave.

Absent a continuance of the plea hearing, Ms. Bowlin will have no alternative but to take absence without approved leave and jeopardize a full-time position she has held for over one year.

5. Undersigned counsel is authorized to that that Assistant United States Attorney Monica D. Coleman does not oppose a continuance of this proceeding.

WHEREFORE, considering these circumstances, counsel respectfully requests that the plea hearing in the instant matter be continued to the week of January 30, 2023, so that Ms. Bowlin can make the necessary arrangements with her employer in advance to attend.

Date: January 10, 2023.

Respectfully submitted,

TIFFANY BOWLIN

By Counsel

WESLEY P. PAGE
FEDERAL PUBLIC DEFENDER

s/Rachel E. Zimarowski

Rachel E. Zimarowski, WV Bar No. 11415

Office of the Federal Public Defender

300 Virginia Street, East, Room 3400

Charleston, WV 25301

Telephone: (304) 347-3350

Facsimile: (304) 347-3356

E-mail: Rachel_Zimarowski@fd.org