UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
	:	
v.	:	**No. 21 CR 284 (JDB)**
	:	
	:	**Sentencing Date: 12/3/21**
JAMES KYLE BELL,	:	
Defendant.	:	

CONSENT MOTION TO CONTINUE SENTENCING

James Bell, by and through undersigned counsel, respectfully moves this Court to continue the sentencing currently scheduled for Friday December 3, 2021.

In support of the motion, counsel states the following:

1. Mr. Bell's sentencing is scheduled for 2 p.m., Friday, December 3, 2021.
2. Counsel's mother (79) has an appointment for an eye injection related to a retinal vitreous hemorrhage also scheduled for December 3, 2020. Counsel is her mother's sole caregiver.
3. Based on the medical situation, and scheduling conflict, counsel will be unable to handle Mr. Bell's sentencing on December 3, 2021.
4. Counsel contacted the USAO regarding its consent to rescheduling the sentencing date. The government has no objection to appearing virtually for sentencing at 2 p.m. on Monday December 6, 2021.
5. For good cause shown, Mr. Bell requests that the Court continue his sentencing hearing to December 6, 2021.

WHEREFORE, Mr. Bell respectfully requests that the Court continue the sentencing hearing scheduled for December 3, 2021, to 2 p.m. December 6, 2021.

Respectfully submitted,

/s/ Brandi Harden
Brandi Harden, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2021, I caused a copy of the foregoing motion to be served on counsel of record via ECF.

/s/ Brandi Harden

Brandi Harden, Esq.