MOTION TO CONTINUE SENTENCING

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA

United States of America
Plaintiff,

V.

Ross-Sylvester ELENDU
Defendant

Case No: 3:24-cr-00142-PDW

MOTION TO CONTINUE SENTENCING

Comes Now the Defendant, proceeding "Pro SE" with standby counsel, and respectfully moves this court for a continuance of the currently scheduled sentencing hearing set for July 13th, 2026 and requests that sentencing be continued approximately sixty (60) days.

In support of this motion, Defendant states as follows:

- Defendant was recently granted Leave to proceed pro se with Standby counsel appointed by the Court.
- Due to the recent change in representation status, Defendant and Standby Counsel require additional time to adequately review and prepare matters relevant to sentencing and pending post-trial issues.
- Defendant has not yet had a meaningful opportunity to fully review:
  * The Presentence Investigation Report (PSR)
  * Discovery materials
  * Trial transcripts
  * Grand Jury related transcripts or records relevant to Defendant's pending and anticipated filings.

- Additional time is necessary for Defendant to:
* Prepare objections to the PSR,
* Review the record
* Determine whether supplemental motions are necessary, and adequately prepare for sentencing.

Defendant respectfully submits that this request is made in good faith and not for purposes of delay, but to ensure meaningful preparation and to protect Defendant's rights to due process and effective participation in sentencing proceedings.

Granting a reasonable continuance would not unfairly prejudice the Government and would promote the interests of justice by allowing adequate preparation by both Defendant and Standby Counsel.

WHEREFORE, Defendant respectfully requests that the Sentencing hearing currently scheduled for July 13th, 2026, be continued for approximately sixty (60) days, or to another date convenient for the Court.

Respectfully,
Ross-Sylvester EKENSU
PRO SE Defendant
Inmate Number: 2026-00001971
06/09/2026

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was mailed to the United States Attorney's office and Stand by Counsel on this 9th day of June, 2026, and mailed to the clerk of Court for filing.