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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

UNITED STATES OF AMERICA, Plaintiff, vs. NICHOLAS JONES, Defendant.	Case No. 1:22-cr-00104-DCN **UNOPPOSED MOTION TO CONTINUE SENTENCING**

The United States of America, by and through Joshua D. Hurwit, United States Attorney for the District of Idaho, and Rosaleen T. O'Gara and Nicole R. Lockhart, Trial Attorneys for the Public Integrity Section of the Criminal Division of the United States Department of Justice, hereby move this Court, pursuant to Federal Rule of Criminal Procedure 32(b), to continue the

sentencing in this case, currently scheduled for September 27, 2022, until at least October 19, 2022. This is the Government's first request for a continuance of the sentencing.

This joint motion is based upon the following grounds:

1. The sentencing in this case is currently scheduled for 10:00 a.m. on September 27, 2022.

2. Counsel for the Government has conflicts with this setting, including that the United States Attorney is scheduled to be out of town on business.

3. On September 2, 2022, counsel for the Government contacted counsel for the Defendant, who responded that the Defendant had no objection to the Government's continuance request.

4. On September 2, 2022, counsel for the Government also contacted the Court's staff, who indicated that October 19, 2022 would be the earliest available date for resetting the sentencing.

5. Accordingly, the parties respectfully request the Court to continue the sentencing in this matter until October 19, 2022 or thereafter at the Court's convenience.

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Respectfully submitted this 6th day of September, 2022.

/s/ Joshua D. Hurwit
JOSHUA D. HURWIT
United States Attorney

COREY R. AMUNDSON
CHIEF, PUBLIC INTEGRITY SECTION

By:

/s/ Rosaleen T. O'Gara
ROSALEEN T. O'GARA
NICOLE R. LOCKHART
Trial Attorneys

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 6, 2022, the foregoing **MOTION TO CONTINUE SENTENCING** was electronically filed with the Clerk of the Court using the CM/ECF system, and that a copy was served on the following parties or counsel by:

Mike French Bartlett & French PLLP 1002 W. Franklin Street Boise, ID 83702 mike@bartlettfrench.com	☐ United States Mail, postage prepaid ☐ Fax ☒ ECF filing ☐ Email

/s/ Brandi Fifer
Legal Assistant