

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Case No.: 1:21-CR-312-JEB

UNITED STATES OF AMERICA,

v.

BRADLEY BENNETT

Defendant.

**Second
Motion to Continue
Sentencing for 30-Days**

The Defendant, Bradley Bennett, by and through undersigned counsel, hereby moves the Court to continue the Sentencing Hearing, currently set for January 7, 2025, for no less than thirty (30) days. In support of this motion, Mr. Bennett states the following:

1. Undersigned Counsel, Joseph Ross's father passed away on December 29, 2024, and the funeral is currently set for January 7, 2025, in Philadelphia, PA.
2. Mr. Ross will not be able to participate in Mr. Bennett's Sentencing Hearing on January 7, 2025, due to the unfortunate death of Mr. Ross's father and subsequent funeral arraignments.
3. Mr. Ross is a significant and critical part of the defense team.
4. Mr. Bennett is not in custody, and he is in compliance with his pretrial release conditions.
5. The defendant has attempted to confer with the government about the

defendant's request to continue Mr. Bennett's Sentencing Hearing but has not received a response as to their position to this motion.

WHEREFORE, the defendant respectfully requests a 30-day extension to prepare for the Sentencing Hearing. This Motion is made in good faith and not for purposes of undue delay. The ends of justice served by this motion outweigh the interests of the public and the defendant in a speedy trial as set forth in 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted, this the 30th day of December, 2024.

/s/ Joseph Ross
/s/Leza Lee Driscoll
/s/Rosemary Godwin

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Certificate of Service

I certify the foregoing Defendant's Motion was served on the following via the Court's electronic filing system:

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This the 30th day of December, 2024.

/s/ Joseph Ross
/s/Leza Lee Driscoll
/s/Rosemary Godwin

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