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14 **UNITED STATES DISTRICT COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 MARGARET E. HUNTER (2),

20 Defendant.

Case No. 18CR3677-W

JOINT MOTION TO CONTINUE
MARGARET HUNTER SENTENCING
HEARING

DATE: April 6, 2020

TIME: 9:00am

COURT: 3C (Schwartz)

HON. THOMAS J. WHELAN

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22 The United States of America, by and through its counsel David D. Leshner, Attorney
23 for the United States, Acting under Title 28, U.S.C. Section 515, and Emily W. Allen, W.
24 Mark Conover, and Phillip L.B. Halpern, Assistant U.S. Attorneys, and Defendant Margaret
25 E. Hunter, by and through her attorneys of record, Thomas W. McNamara and Logan D.
26 Smith, respectfully move jointly to request a continuance of Ms. Hunter's sentencing
27 hearing to May 4, 2020 (9:00 a.m.), or as soon thereafter as is convenient for the court.
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1 In support of this joint motion, the parties submit that:

- 2 1. On January 22, 2020, the Court ordered that Margaret Hunter’s sentencing
3 hearing be rescheduled to April 7, 2020 (later changed to April 6, 2020).
- 4 2. On March 17, 2020, the Chief United States District Judge of the Southern
5 District of California entered an Order suspending jury trials and other
6 proceedings (including sentencings) scheduled to begin before April 16, 2020.
7 *See* Order of the Chief Judge No. 18, Suspension of Jury Trials and Other
8 Proceedings during the COVID-19 Public Emergency (March 17, 2020).
- 9 3. This Order was imposed, *inter alia*, due to: (1) the state of emergency declared
10 in response to the spread of the coronavirus (COVID-19); and (2) the
11 restrictions on public gatherings recommended by the Centers for Disease
12 Control and Prevention.
- 13 4. In light of the Court’s March 17, 2020 order, and in order to protect public
14 safety and prevent the spread of the COVID-19 outbreak, the parties jointly
15 request that Margaret Hunter’s sentence be continued until May 4, 2020 at 9:00
16 a.m.

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Signature Certification

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Logan D. Smith., counsel for Margaret Hunter, and that I have obtained said counsel's authorization to affix their electronic signature to this document.

DATED: March 30, 2020

Respectfully submitted,

DAVID D. LESHNER
Attorney for the United States
Acting under Title 28, U.S.C. Section 515

s/ Phillip L.B. Halpern
EMILY W. ALLEN
W. MARK CONOVER I
PHILLIP L.B. HALPERN
Assistant U.S. Attorneys

DATED: March 30, 2020

By: MCNAMARA SMITH LLP
/s/ Logan D. Smith
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