UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA)
Plaintiff,))) CAUSE NO.: 1:12-CR-0127-WTL-TAB
vs.)
DONALD JOHN SACHTLEBEN,)
)
Defendant.)

DEFENDANT'S UNOPPOSED MOTION TO CONTINUE GUILTY PLEA AND SENTENCING

Defendant, Donald J. Sachtleben, by counsel, Charles C. Hayes and Kathleen M.

Sweeney, moves the court to continue the guilty plea and sentencing scheduled for August 8,

2013 at 10:00 a.m. In support, Sachtleben states:

- This matter is set for change of plea hearing and sentencing on August 8, 2013 at 10:00 a.m. Defendant is on pre-trial release.
- Undersigned counsel and co-counsel Hayes begin a jury trial in Newton County, Indiana on August 6, 2013 in the matter of *State of Indiana v. Michael Thrall,* Cause No. 56D01-1112-FB-14. This confirmed, first choice, jury is scheduled to last for the week.
- Defendant anticipates presenting testimony that may require up to two hours of court time.
- Defendant would like to be sentenced as soon after the August 8, 2013 as possible.

- 5. Assistant United States Attorney, Steven D. DeBrota, does not object to this motion.
- 6. For purposes of scheduling, all parties and counsel are available August 13, 2013.

Respectfully submitted,

/s/Kathleen M. Sweeney Kathleen M. Sweeney 141 E. Washington St. Ste. 225 Indianapolis IN 46204 T: 317-491-1050 F: 317-491-1043 ksween@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on July 3, 2013 a copy of the foregoing was filed electronically. Notice of this filing will be sent to the parties by operation of the Court's electronic filing

system. Parties may access this filing through the Court's system.

<u>/s/Kathleen M. Sweeney</u> Kathleen M. Sweeney

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