

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	Case No.: 2:15-cr-00212-TFM
)	
v.)	Case No.: 2:16-cr-00132-TFM
)	
ABIGALE LEE MILLER)	

JOINT MOTION FOR CONTINUANCE OF SENTENCING HEARING

AND NOW, comes the United States of America, and Defendant, Abigale Lee Miller (“Ms. Miller”), by and through undersigned counsel, and file this Joint Motion for Continuance of Sentencing Hearing, stating as follows:

1. On June 27, 2016, Ms. Miller pleaded guilty to one (1) count of concealment of assets in a bankruptcy proceeding in violation of 18 U.S.C. § 152(1) at Criminal No. 2:15-cr-212, and one (1) count of failing to file a report under 31 U.S.C. § 5316 in violation of 31 U.S.C. § 5324(c)(1) at Criminal Docket No. 2:16-cr-132.
2. Ms. Miller is presently scheduled to be sentenced on October 11, 2016.
3. However, the Court has approved the agreement entered into between Ms. Miller and the Government in which sentencing shall not occur until after the United States Court of Appeals for the Third Circuit renders a decision in *United States v. Free*, No. 15-2939.
4. Furthermore, due to conflicting schedules and the amount of information that must be analyzed, the U.S. Probation Office needs additional time to complete the Pre-Sentence Investigation Report in this matter.
5. Accordingly, the Government and Ms. Miller respectfully request that this Court continue the sentencing hearing in this matter for at least 45 days.

WHEREFORE, the United States of America, and Defendant, Abigale Lee Miller, respectfully request that this Honorable Court grant their Joint Motion for Continuance of Sentencing Hearing, and enter the proposed Order attached hereto.

Date: August 23, 2016

Respectfully submitted,

DAVID J. HICKTON
United States Attorney

CLARK HILL, PLC

/s/Gregory C. Melucci
Assistant U.S. Attorney
PA I.D. No. 56777
700 Grant Street, Suite 4000
Pittsburgh, PA 15219
(412) 894-7324
gregory.melucci@usdoj.gov

/s/Brandon J. Verdream
Robert J. Ridge, Esquire
PA I.D. No.: 58651
E-mail: rridge@clarkhill.com
Brandon J. Verdream, Esquire
PA I.D. No.: 204162
E-mail: bverdream@clarkhill.com

Firm I.D. No.: 282
One Oxford Centre
301 Grant Street, 14th Floor
Pittsburgh, PA 15219
Telephone: (412) 394-7711
Fax: (412) 394-2555

Attorneys for Defendant, Abigale Lee Miller

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **Joint Motion for Continuance of Sentencing Hearing and proposed Order** have been served on all counsel of record this 23rd day of August, 2016, by this Court's CM/ECF e-filing notification system.

/s/ Brandon J. Verdream _____

Brandon J. Verdream, Esquire

PA I.D. No.: 204162

E-mail: bverdream@clarkhill.com

Deadline.com