

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

2011-08-29

UNITED STATES OF AMERICA,)

)

Plaintiff,)

)

v.) (Filed Under Seal)

)

IDENTITY UNDER SEAL,)

)

Defendant.)

CAUSE NO. 1:11-CR-0048-TWP-KPF

DOCUMENT FILED UNDER SEAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No. 1:11-CR-0048-TWP-KPF
	)	
	)	
DAVID P. AGRANOFF,	)	
	)	
Defendant.	)	

JOINT MOTION TO CONTINUE
SENTENCING HEARING

The United States of America, by counsel, Joseph H. Hogsett, United States Attorney for the Southern District of Indiana, Cynthia J. Ridgeway, Assistant United States Attorney, and David P. Agranoff, by and through counsel, Michael J. Donahoe, herein jointly move the Court to continue the change of plea and sentencing hearing now set for September 8, 2011. In support thereof, the parties would show the Court the following:

1. On March 17, 2011, a charging Information alleging a violation of 18, United States Code, Section 4 (Misprision of a Felony) was filed together with a plea agreement in the instant matter;
2. The plea agreement filed on March 17, 2011, contemplated the defendant's agreement to cooperate by attempting to provide substantial assistance to the government;
3. This case is set for a change of plea and sentencing hearing on September 8, 2011;

4. The Defendant has not yet completed the cooperation he intends to provide to the government in consideration of a motion pursuant to U.S.S.G. § 5K1.1.

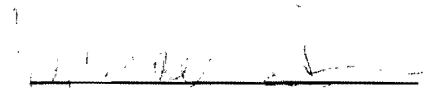
5. In consideration of the Defendant's attempts to cooperate with the government, the parties request a 90-day continuance.

WHEREFORE, the United States and the Defendant pray the Court to continue the change of plea and sentencing hearing now set for September 8, 2011, and for all other just and proper relief.

Respectfully submitted,

JOSEPH H. HOGSETT
United States Attorney

By: 
Cynthia J. Ridgeway
Assistant United States Attorney

By: 
Michael J. Donahoe
Attorney at Law