



4. Once the defendant's memos and the government's responses have been filed, the Court will deliberate on the post-trial motions and the parties, which need to assume that these motions will be denied, will use the ensuing time to prepare sentencing papers, including sentencing memos.

WHEREFORE, McKelvy requests this Court to grant the defendant's Motion for Continuance of the Sentencing.

Respectfully submitted,

/s/ Walter S. Batty, Jr.  
Walter S. Batty, Jr., Esq.  
101 Columbia Ave.  
Swarthmore, PA 19081  
(610) 544-6791  
PA Bar No. 02530  
tbatty4@verizon.net

/s/ William J. Murray, Jr.  
William J. Murray, Jr., Esq.  
Law Offices of  
William J. Murray, Jr.  
P.O. Box 22615  
Philadelphia, PA 19110  
(267) 670-1818  
PA Bar No. 73917  
williamjmurrayjr.esq@gmail.com

Dated: December 21, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have served by electronic mail a true and correct copy of the foregoing Defendant's Motion for Continuance of the Sentencing upon Assistant U.S. Attorneys Robert J. Livermore and Sarah Wolfe:

Robert J. Livermore, Esq.  
U.S. Attorney's Office  
615 Chestnut Street  
Philadelphia, Pa 19106  
215-861-8505  
Fax: 215-861-8497  
Email:  
robert.j.livermore@usdoj.gov

Sarah Wolfe, Esq.  
U.S. Attorney's Office  
615 Chestnut Street  
Philadelphia, Pa 19106  
215-861-8505  
Fax: 215-861-8497  
Email:  
SWolfe@usa.doj.gov

/s/ Walter S. Batty, Jr.  
Walter S. Batty, Jr.

Dated: December 21, 2018