

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

UNITED STATES OF AMERICA

V.

ALICIA KEIR

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Cause No. 2:15 CR 49

MOTION TO CONTINUE

Defendant Alicia Keir by counsel, P. Jeffrey Schlesinger, moves to continue the sentencing hearing in this matter now set for August 20, 2015. In support of her motion, Defendant would show the court that:

1. She was charged with one count of Involuntary Manslaughter pursuant to 18 U.S.C. §1112(a) and 18 U.S.C. §1112(b) by Information on April 29, 2015.

2. Following her initial appearance on May 13, 2015, she submitted a plea agreement. The hearing on the plea agreement was held on the same day at which time Defendant Keir pled guilty to one count of Involuntary Manslaughter. She was released on unsecured bond and has remained released since that time.

3. A sentencing hearing was scheduled for August 20, 2015 at 1:00 p.m.

4. Ms. Keir's nephew, Dennis Wynn, eighteen months of age, passed away on August 11, 2015. Ms. Keir was very close to her nephew and assisted in his care. Funeral arrangements are being made. It is extremely difficult for Ms. Keir's family to deal with the death of her nephew and the possibility of her being incarcerated in this case.

5. Counsel for Defendant has spoken to assistant United States attorney Randall Stewart who indicates no objection to a continuance of the sentencing hearing.

WHEREFORE, Defendant Keir prays that the court continue the sentencing hearing in this cause and all other appropriate relief.

Respectfully submitted,

/s/P. Jeffrey Schlesinger
P. Jeffrey Schlesinger
8396 Mississippi Street
Suite G
Merrillville, IN 46410

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Randall Stewart
Gary Bell

/s/P. Jeffrey Schlesinger
P. Jeffrey Schlesinger