UNITED STATES OF AMERICA,)
Plaintiff,) No. 2:16-cr-00160-GSL-JEM
V.)) Hon. Gretchen S. Lund
JAMES E. SNYDER,) Holl. Gretchell S. Lulid
Defendant.)

UNOPPOSED MOTION FOR LEAVE TO FILE MOTION TO CONTINUE SENTENCING DATE

Defendant, James Snyder, by counsel, respectfully requests this Court for leave to file his Motion to Continue Sentencing Date,¹ which requests the sentencing date be re-set given undersigned's recent appearance as defense counsel in this case. The Court should grant leave to file this Motion to protect Mr. Snyder's right to counsel of his choosing and afford him the opportunity to fully address and develop all issues related to sentencing. In support of this motion, Mr. Snyder states as follows:

- 1. Mr. Snyder's sentencing is currently set for October 16, 2025. ECF No. 643.
- 2. Mr. Snyder is not in custody.
- 3. Undersigned entered their appearance as defense counsel in this case on September 26, 2025, and will serve as defense counsel at sentencing.
- 4. On June 6, 2025, the Court entered an order requiring all parties to seek leave of Court before filing any motions (other than objections to the Presentence Report and sentencing memoranda) before sentencing. ECF No. 639.

¹ The Motion to Continue the Sentencing Date is attached hereto as **Exhibit 1**.

- 5. A continuance of the sentencing date will afford counsel the necessary time to receive and review all relevant materials, including PSR objections, in preparation for sentencing, and prepare a sentencing memorandum and related submissions.
- 6. Counsel has conferred on this matter with the government and confirmed the government has no objection to a continuance of 60 days.

Mr. Snyder respectfully requests the Court grant him leave to file his Motion to Continue Sentencing Date.

Date: September 26, 2025

Respectfully submitted,

/s/ Joshua J. Minkler

Joshua J. Minkler (Atty. No. 18483-49) Jordan M. Oliver (Atty. No. 36922-49) Barnes & Thornburg LLP 11 South Meridian Street Indianapolis, IN 46204

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Attorneys for Defendant James E. Snyder

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a copy of the foregoing has been served on all counsel of record via the Court's ECF filing system on this 26th day of September, 2025.

/s/ Joshua J. Minkler
Joshua J. Minkler

EXHIBIT 1

UNITED STATES OF AMERICA,)
Plaintiff,) No. 2:16-cr-00160-GSL-JEM
v.)
JAMES E. SNYDER,) Hon. Gretchen S. Lund
Defendant.))

UNOPPOSED MOTION TO CONTINUE SENTENCING DATE

Defendant, James Snyder, by counsel, respectfully requests a continuance of the sentencing date for a period of sixty (60) days, and in support of the motion, states as follows:

- 1. Mr. Snyder's sentencing is currently set for October 16, 2025. ECF No. 643.
- 2. Mr. Snyder is not in custody.
- 3. Undersigned entered their appearance as defense counsel in this case on September 26, 2025, and will serve as defense counsel at sentencing.
- 4. A continuance of the sentencing date will afford counsel the necessary time to receive and review all relevant materials, including PSR objections, in preparation for sentencing, and prepare a sentencing memorandum and related submissions.
 - 5. This is Mr. Snyder's second request for a new sentencing date.
 - 6. This motion is not made for purposes of delay.
- 7. Counsel has conferred on this matter with the government and confirmed the government has no objection to a continuance of 60 days.

Mr. Snyder respectfully requests the Court to continue the sentencing date from October 16, 2025 to a date convenient for the Court in mid-December 2025, and that the due dates for sentencing submissions also be re-set to correspond with the new sentencing date.

Date: September 26, 2025

Respectfully submitted,

/s/ Joshua J. Minkler

Joshua J. Minkler (Atty. No. 18483-49) Jordan M. Oliver (Atty. No.36922-49) Barnes & Thornburg LLP 11 South Meridian Street

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Email: josh.minkler@btlaw.com jordan.oliver@btlaw.com

Attorneys for Defendant James E. Snyder

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a copy of the foregoing has been served on all counsel of record via the Court's ECF filing system on this 26th day of September, 2025.

/s/ Joshua J. Minkler
Joshua J. Minkler

UNITED STATES OF AMERICA,)	
Plaintiff,) No. 2:16-cr-00160-GSL-JEM	
V.)	
JAMES E. SNYDER,) Hon. Gretchen S. Lund)	
Defendant.)	
	ORDER ON DEFENDANT'S NTINUE SENTENCING DATE	
This matter is before the Court of	on the Defendant's Unopposed Motion to Continue the	
October 16, 2025 Sentencing Date and R	Related Deadlines. The Court, being duly advised, now	
GRANTS the Motion and rules as follow	s:	
The Sentencing Memorane	da Submission Deadline is reset from October 2, 2025 to	
, 2025 at _	_: AM/PM.	
• The Sentencing Hearing is reset from October 16, 2025 to, 202		
at: AM/PM.		
SO ORDERED.		
	Judge	
	United States District Court	

UNITED STATES OF AMERICA,)	
D1-:-4:66)	No. 2.16 or 00160 CSL IEM
Plaintiff,)	No. 2:16-cr-00160-GSL-JEM
v.)	
)	Hon. Gretchen S. Lund
JAMES E. SNYDER,)	
)	
Defendant.)	

[PROPOSED] ORDER ON DEFENDANT'S MOTION FOR LEAVE TO FILE MOTION TO CONTINUE SENTENCING DATE

This matter is before the Court on the Defendant's Unopposed Motion for Leave to File Motion to Continue Sentencing Date.

The Court having considered the motion, and being duly advised, hereby GRANTS the motion, and ORDERS that Defendant's Motion to Continue the Sentencing Date be deemed filed as of September 26, 2025, and will be considered by the court on the merits.

SO ORDERED.

Judge United States District Court