## IN THE UNITED STATES DISTRICT COURT, FOR THE NORTHERN DISTRICT OF INDIANA, HAMMOND DIVISION

| UNITED STATES OF AMERICA, | ) |                           |
|---------------------------|---|---------------------------|
| v. Plaintiff,             | ) | No. 2:16 CR 00160-GSL-JEM |
|                           | ) |                           |
|                           | ) |                           |
|                           | ) |                           |
| JAMES E. SNYDER,          | ) |                           |
|                           | ) |                           |
| Defendant.                | ) |                           |

## UNOPPOSED MOTION TO RESET SENTENCING DATE

JAMES SNYDER, through counsel, respectfully requests that the sentencing date of September 9, 2025, be reset due to conflict with Seventh Circuit oral argument schedule. Mr. Snyder also requests that the due dates for the sentencing submissions for the defendant and the government be changed to correspond to the new sentencing date. In support of this objection, Mr. Snyder states the following:

- (1) Mr. Snyder's sentencing date is currently set for September 9, 2025.
- (2) The Seventh Circuit Court of Appeals has set one of counsel's cases for argument on September 9, 2025, at 9:30 a.m., in *United States v. Collins*, No. 24-2161.
- (3) Mr. Snyder may call four witnesses on his behalf at sentencing and anticipates needing at least one-half day for the sentencing.
- (4) It is not possible to know where in the argument schedule counsel will be set until the morning of argument.

(5) Counsel for Mr. Snyder has consulted with the government attorneys and they do not oppose this motion.

(6) Government counsels are on trial in September and have no other September dates available but are available in October except for October 10. A date in early to mid-October would also work for Mr. Snyder and defense counsel.

WHEREFORE, JAMES SNYDER, through counsel, respectfully requests that the September 9, 2025 sentencing date be re-set and that the due dates for sentencing submissions also be re-set to correspond with the new sentencing date.

DATE: July 31, 2025 Respectfully submitted,

By: s/Andréa E. Gambino An Attorney for James E. Snyder Law Offices of Andréa E. Gambino 53 W. Jackson Blvd., Suite 1332 Chicago, Illinois 60604 (312) 322-0014 andrea@gambinodefense.com

## CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2025, 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:

Julia Schwartz, Esq. Richard Rothblatt, Esq. Assistant United States Attorneys

and I hereby certify that I have mailed by United State Postal Service, or handdelivered the document to the following non-CM/ECF participants: N/A.

DATE: July 31, 2025 Respectfully submitted,

By: s/Andréa E. Gambino An. Attorney for James E. Snyder

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