

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

UNITED STATES

v.

KYLE WILLIAM SPITZE

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No. 3:24-CR-25
VARLAN/McCOOK

MOTION TO CONTINUE DEADLINE TO FILE
OBJECTIONS TO PRESENTENCE INVESTIGATION REPORT

Comes the Defendant, Kyle Spitze, by and through counsel, and moves to continue his deadline to file Objections to the Presentence Investigation Report. In support of this request the Defendant offers the following grounds:

1. The Presentence Investigation Report (PSR) was filed on June 24, 2025 [Doc. 44]. This report contains factual material which could present unusual and difficult issues for the Court to resolve at sentencing. To address this concern, undersigned counsel has spoken with Probation Officer Scott Queener and has met and conferred with the government in an effort to resolve any disagreement. These conversations were frank and productive, but more work is required.

2. The Court has notified the parties that the sentencing hearing now set on July 29, 2025, must be rescheduled. Therefore, a postponement of this deadline should not independently cause a delay of sentencing.

3. The Defendant has already waived trial and entered a guilty plea. Due to the extreme period of incarceration he faces, time is not of the essence, and the request to postpone this deadline will serve the ends of justice.

WHEREFORE, the Defendant respectfully requests a continuance of his deadline to file
Objections to the PSR.

Respectfully submitted this 8th day of July, 2025.

KYLE WILLIAM SPITZE

By: /s/ Jonathan D. Cooper

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