IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	§	
	§	
	§	
v.	§	Case No. 21-CR-00022
	§	
	§	
CHRISTOPHER RAY GRIDER,	§	
	§	
Defendant	§	

DEFENDANT'S UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE AND TOLL SPEEDY TRIAL LIMITS

TO THE HONORABLE COLLEEN KOLLAR-KOTELLY, UNITED STATES DISTRICT COURT JUDGE FOR THE DISTRICT OF COLUMBIA:

CHRISTOPHER RAY GRIDER, the Defendant in the above-styled and numbered cause, by and through undersigned counsel, moves this Court to continue the status conference presently scheduled for August 30, 2021 and continue to toll the speedy trial limits set out in 18 U.S.C. § 3161. In support thereof, Mr. Grider would show the following.

- 1. This Court last held a status conference on Mr. Grider's case on July 1, 2021. The parties represented to this Court that the Government has additional discovery to produce to the Defendant and undersigned counsel is still reviewing the discovery while conducting his own investigation of the alleged acts.
- 2. The Court further confirmed that Mr. Grider desired to have his motion to dismiss held in abeyance pending further investigation.
- 3. Undersigned counsel conferred with counsel for the Government, Candice Wong, last week to discuss the status of the case and confirmed that the Government still

has additional discovery to produce to the Defendant and undersigned counsel is

still reviewing the discovery while conducting his own investigation of the alleged

acts. Accordingly, counsel for the Government is not opposed to this motion. Both

parties maintain that this motion is made not for the purpose of delay but in the

best interests of justice.

4. Undersigned counsel has conferred with Mr. Grider regarding his speedy trial

rights under the Speedy Trial Act, 18 U.S.C. § 3161 et al., and he has no objection

to the continued tolling of the time limits set out therein.

WHEREFORE, PREMISES CONSIDERED, Mr. Grider respectfully requests

this Honorable Court continue the status conference presently scheduled for August

30, 2021 for sixty (60) days and continue to toll the speedy trial limits set out in 18

U.S.C. § 3161.

Date: August 26, 2021

Respectfully Submitted,

MAYR LAW, P.C.

by: /s/ T. Brent Mayr

T. BRENT MAYR

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ATTORNEY FOR THE DEFENDANT,

CHRISTOPHER RAY GRIDER

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CERTIFICATE OF CONFERENCE

I certify that I conferred with Counsel for the Government, Candice Wong, and she is not opposed to this motion.

/s/ T. Brent Mayr T. BRENT MAYR

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the Government, Candice Wong, on August 26, 2021, via CM/ECF and email.

/s/ T. Brent Mayr T. BRENT MAYR

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Defendant	§	

ORDER ON DEFENDANT'S UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE AND TOLL SPEEDY TRIAL LIMITS

The Court has considered the Defendant's Unopposed Motion to Continue Status Conference and Toll Speedy Trial Limits, wherein counsel for Defendant has represented that additional time is needed to obtain and review discovery from the Government, as well as investigate the allegations against Defendant. Based on those representations and those made in the Motion for Continuance, the Court finds that the ends of justice served by granting a continuance outweigh the best interest of the public, as well as the Defendant and his right to a speedy trial. The Court also finds that pursuant to 18 U.S.C. § 3161(h)(7)(A) & (B), failure to grant a continuance would result in a miscarriage of justice and that a continuance is necessary to allow reasonable time for trial preparation.

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SIGNED this	day of	, 2021.