

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

Criminal Action No. 21-22 (CKK)

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 March 30, 2022 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 January 13, 2022.

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. Mr. Grider previously moved to continue the status conference subsequently scheduled for February 10, 2022 as the Government was continuing to produce discovery and undersigned counsel was reviewing those items. (Doc. 76, 79). This

Court granted that motion, continued the status conference to March 10, 2022, found that the ends of justice served by granting a continuance outweigh the best interest of the public, as well as Mr. Grider and his right to a speedy trial, and, thus excluded that time, pursuant to 18 U.S.C. § 3161(h)(7)(A) & (B). (Minute Order of 2/9/22).

3. On February 10, 2022, counsel for the Government filed with this Court the United States' Memorandum Regarding Status of Discovery as of February 9, 2022. (Doc. 80). As that memorandum confirmed, substantial amounts of discovery have been made available to Defendant via the Relativity platform. Undersigned counsel has obtained access to that platform and has been reviewing discovery contained therein. However, as the memorandum sets out, there are still several items that the Government intends to turn over.
4. Given the sheer volume of material, counsel for Defendant anticipates needing a considerable amount of time for him and his team to review that material.
5. Undersigned counsel conferred with counsel for the Government, Candice Wong, and confirmed she 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.
6. 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 March

30, 2022 for sixty (60) days and continue to toll the speedy trial limits set out in 18 U.S.C. § 3161.

Date: March 29, 2022

Respectfully Submitted,

**MAYR LAW, P.C.**

by: /s/ T. Brent Mayr

T. BRENT MAYR

Texas State Bar Number 24037052

D.C.D.C. Bar ID TX0206

bmayr@mayr-law.com

5300 Memorial Dr., Suite 750

Houston, TX 77007

Telephone: 713-808-9613

Fax: 713-808-9613

ATTORNEY FOR THE DEFENDANT,  
CHRISTOPHER RAY GRIDER

**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 March 29, 2022, via CM/ECF and email.

/s/ T. Brent Mayr

T. BRENT MAYR