IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES *

Plaintiff *

Vs. * Case No.: 22-CR-0216

DAVID WALLS-KAUFMAN

Defendant *

* * * * * * * * * * * *

JOINT MOTION FOR CONTINUANCE OF PRE TRIAL SET FOR DECEMBER 19th, 2022

COMENOW the Parties by and through their respective attorneys and respectfully move this Court to continue this case, and as reasons states as follows:

- 1. This case is presently set for a Status Conference on December 19, 2022 at 10:00am;
- 2. That the Parties have engaged in extensive plea negotiations and have set a in person reverse proffer session for January 5th at 10:00 am, because of the holidays was the earliest date available.
- 3. That it is in the interests of justice to continue the above-styled Trial.
- 4. That no party to this proceeding will be prejudiced by a continuance.
- 5. Defendant consents that the time shall be excludable to the Defendant's Speedy Trial right that started on 10/18/22 and will continue to 1/17/23, the new proposed date for status.

WHEREFORE, the premises considered, the Parties pray that this Honorable Court:

- A. Continue this matter to the next available date;
- B. And for other and further relief that this Court deems just and proper.

Respectfully submitted,

KEMET HUNT LAW GROUP, INC.

/s/ Hughie D. Hunt Hughie D. Hunt, Esq. DC Bar# 486347 5000 Sunnyside Avenue, Suite 101 Beltsville, MD 20705 (301) 982-0888 Attorney for Defendant hhunt@kemethuntlaw.com

MATTHEW M. GRAVES UNITED STATES ATTORNEY D.C. Bar No. 481052

By: /s/ Jeffrey A. Kiok

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of December 2022 a copy of the foregoing Joint Motion for Continuance was served electronically via this Court's CM/ECF upon Attorney for Plaintiff, Jeffrey Kiok.

/s/ Hughie D. Hunt Hughie D. Hunt, Esq.