

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

UNITED STATES OF AMERICA

v.

EDWARD KELLEY,

Defendant.

CR NO. 22-MJ-96

**CONSENT MOTION TO CONTINUE STATUS HEARING AND EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT**

The United States, through undersigned counsel, hereby files this motion to adjourn the status hearing set for Thursday, June 16, 2022, in the above-captioned matter, for approximately 60 days, until Tuesday, August 16, 2022. Defense counsel concurs in this motion. The parties request the additional time to engage in plea negotiations and review preliminary discovery productions.

The parties request that the Court exclude the time until the status conference on August 16, 2022, pursuant to 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

MATTHEW M. GRAVES
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D.C. Bar Number 481052

By: /s/ Samuel S. Dalke
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CERTIFICATE OF SERVICE

On this 9th day of June, a copy of the foregoing was served on counsel of record for the defendant via the Court's Electronic Filing System.

By: /s/ Samuel S. Dalke
SAMUEL S. DALKE
Assistant United States Attorney – Detailee