

**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 AND PRELIMINARY HEARING AND
EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States, through undersigned counsel, hereby files this motion to adjourn the status and preliminary hearing set for Tuesday, December 20, 2022, in the above-captioned matter, for approximately 60 days, until Tuesday, February 28, 2023. Counsel for the parties have a conflict for the week of February 20th, which is why the following week is proposed. Defense counsel concurs in this motion. The parties request the additional time to continue to engage in plea negotiations, calculate the likely sentencing guidelines, and review discovery productions.

The parties request that the Court exclude the time until the status conference on February 28, 2023, 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 indictment and trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

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

On this 8th day of December, 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