

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

JAMES RUSSELL DAVIS

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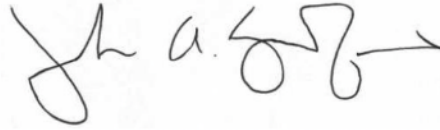
Case No. 21-cr-595 (TJK)

**DEFENDANT’S UNOPPOSED MOTION TO CONTINUE**

COMES NOW, James Russell Davis, by and through counsel, and hereby moves this Court for a continuance in the above-captioned proceeding of approximately 60 days, and further, to exclude the time within which the trial must commence under the Speedy Trial Act, 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. In support of his motion, Mr. Davis states as follows:

1. A status conference is scheduled in this matter for August 1, 2022, at 10:00AM.
2. On June 30, 2022, Government counsel provided a plea offer for Mr. Davis’s consideration. Defense counsel needs additional time to review discovery and discuss the findings and the plea offer with Mr. Davis.
3. Defense counsel has spoken with counsel for the Government, and Government counsel consented to the filing of this motion and to tolling the Speedy Trial Act until the rescheduled status hearing.
4. The parties agree that this case is “unusual and complex” due to the nature of the prosecution. *See* 18 U.S.C. § 3161(h)(7)(B)(ii), *see also* § 3161(h)(7)(B)(iv), and that, therefore, the time until the rescheduled status hearing should be excluded in calculating the time within which the defendant must be brought to trial under the Speedy Trial Act.

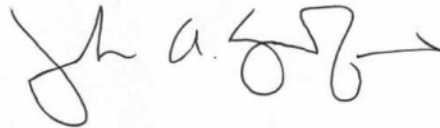
Respectfully submitted,

A handwritten signature in black ink, appearing to read "J.A. Scrofano" with a stylized flourish at the end.

Joseph A. Scrofano, Esq.  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Motion was emailed to: AUSA Benjamin Kringer at the United States Attorney's Office for the District of Columbia, 555 Fourth Street, N.W. Washington, D.C. 20530 this 26<sup>th</sup> day of July, 2022.

A handwritten signature in black ink, appearing to read "J.A. Scrofano" with a stylized flourish at the end.

Joseph A. Scrofano, Esq.  
*Counsel for James Davis*