IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)		
v.)	Case No.	21-CR-224 (TSC)
KENNETH GRAYSON Defendant.)))		
)		

UNOPPOSED MOTION TO CONTINUE STATUS HEARING

Defendant, Kenneth Grayson, through undersigned counsel, respectfully requests that the June 1, 2022, Status Hearing in this case be continued until a date after July 11, 2022. In support of this request, the Defendant states:

- 1. The Defendant's next Status Hearing is presently scheduled for June 1, 2022. As noted in earlier filings, the Government recently obtained additional video evidence of the Defendant's conduct on January 6, 2021. This newly discovered evidence has resulted in the parties having to reassess their respective positions with regard to a potential resolution of this matter, and counsel for the Defendant needs additional time to complete plea negotiations with the Government. The Defendant therefore requests that the Court continue the June 1, 2022, Status Hearing until a date after July 11, 2022.
- 2. The Government, per Department of Justice Attorney Detailee Maria Fedor, does not oppose this request.
- 3. The Defendant further requests, based on the reasons stated above, that the time period from June 1, 2022, until the next scheduled hearing in this matter be excluded under the Speedy Trial Act.
- 4. In the event the Court grants this Motion, the parties will contact the Court's courtroom deputy to schedule the next hearing in this case.

Respectfully submitted, A.J. Kramer Federal Public Defender

/s/

David W. Bos Assistant Federal Public Defender 625 Indiana Ave., N.W., Suite 550 Washington, D.C. 20004 (202) 208-7500, ext. 118