

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

UNITED STATES OF AMERICA,
Plaintiff

vs.

CASE NO. 1:22-cr-00136-JMC

STEVEN MILES,
Defendant

UNOPPOSED MOTION TO CONTINUE HEARING

COMES NOW the Defendant, STEVEN MILES, by and through his undersigned counsel and requests that this Honorable Court continue the Change of Plea hearing currently scheduled for April 14, 2023 in person and in support would show the following:

1. The Court scheduled a Change of Plea hearing for April 14, 2023 after the parties advised the court that plea negotiations would commence soon. The defense had finally obtained all of the Defendant's Veterans Administration records which it feels are important for mitigation. The Defendant is charged in the Indictment with eleven (11) counts including two (2) felonies.

2. Recent events have put the negotiations on hold. The undersigned counsel contacted COVID-19 in mid-March, 2023 and was unable to work on the mitigation package to be sent to the Government. The undersigned's illness was followed by a brief recuperation and then followed by a prescheduled ten (10) day vacation. The undersigned counsel returned on April 2, 2023. The undersigned still intends on sending the Government the mitigation package as soon as possible.

3. The Defendant has not expressed any interest in going to trial. Regardless, the Defendant is still concerned that he has not received all discovery materials that he feels are

pertinent to his case. He has also expressed an interest in possibly obtaining recently received video footage of the January 6, 2021 incidents. This footage was released by the United States Speaker of the House allegedly to the national media. The undersigned counsel is unsure if any of this footage is exculpatory or irrelevant to the Defendant's charges. The current posture of the Defendant is that he has asked the undersigned counsel to look into additional discovery other than that which he has already seen

4. The defense requests that the Change of Plea hearing be continued to a future date or the case be reset for Status Hearing to address these and any other possible issues.

5. Assistant United States Attorney Michael Gordon has been contacted and has no objection to this request.

6. This motion is filed in good faith and not for any dilatory purpose.

WHEREFORE the Defendant requests that this case continue the hearing scheduled for April 14, 2023.

s / Ray C. Lopez
RAY C. LOPEZ, ESQUIRE
RAY C. LOPEZ, P.A.
115 South Albany Avenue
Tampa, Florida 33606
(813) 221-4455
Fax: (813) 251-1517
E-mail:
RCLopezlaw@verizon.net
Florida Bar No. 870330
Attorney for the Defendant,
Steven Miles

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed with the Clerk of the Court by using CM/ECF system which will send a notice of electronic filing to the Office of the United States Attorney, on this 3rd day of April, 2023.

s / Ray C. Lopez
RAT C, LOPEZ, ESQUIRE