

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

vs.

CRIMINAL NO. 1:21-CR-458(RJL)

RICHARD CROSY, JR.

July 25, 2022

CONSENT MOTION TO CONTINUE STATUS CONFERENCE

The parties in the above-captioned matter respectfully moves to continue the status conference scheduled for July 27, 2022 by an 30 additional days. The basis for this motion is as follows:

1. During the June 27, 2022 status conference, the parties generally set forth their positions on a trial which is appearing more likely. However, they also stated that they wish to conduct a “reverse proffer” in hopes that an agreed upon disposition may be reached. Accordingly, another status conference was scheduled for July 27, 2022 so that the parties could conduct that meeting and report back on the necessity of a trial.
2. Since that time, counsel for the government had to address a personal situation, thus the parties have not be able to arrange the reverse proffer contemplated at the last status conference.
3. The parties still wish to conduct this meeting, its scheduling as only been frustrated by scheduling difficulties.
4. The parties believe that an additional thirty days should be sufficient time in which to conduct the meeting.
5. Counsel for the government has no objection to this request.
6. Mr. Crosby is willing to waive his speedy trial rights for an additional 30 days.

WHEREFORE, the parties respectfully request that the July 27 status conference be continued by 30 additional days to a date convenient for the Court in late August.

Respectfully Submitted,

/s/Daniel M. Erwin/s/
By Daniel M. Erwin (ct28947)
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CERTIFICATION OF SERVICE

This is to certify that on July 25, 2022, a copy of the forgoing was filed electronically via the Court's CM/ECF system, and by that system, counsel for the Government has been provided with a copy of the forgoing.

/s/Daniel M. Erwin/s/
Daniel M. Erwin