

**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 June 15, 2023 in person and in support would show the following:

1. The Court scheduled a Change of Plea hearing for June 15, 2023 after the parties advised the court that plea negotiations were ongoing. The defense sent a mitigation package to the Government on May 8, 2023 but there still has not been a written plea agreement sent to the defense. Assistant United States Attorney Michael Gordon advised that one has been prepared and supervisory personnel are reviewing it.

2. The defense and the Government have been conferring on dates for a change of plea assuming that the Defendant accepts a Government plea agreement. Conflicts in the schedules of both counsel and this court's docket would suggest that the week of September 25, 2023 is good for the parties and the court.

3. The Defendant waives speedy trial.

4. The defense requests that the Change of Plea hearing be continued to a future date.

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 June 15, 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 13th day of June, 2023.

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