

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

UNITED STATES OF AMERICA

v.

TIM LEVON BOUGHNER,

Defendant.

Case No. 22-cr-0020 (TSC)

DEFENDANT'S CONSENT MOTION TO CONTINUE STATUS HEARING

Defendant Tim Levon Boughner, through counsel, respectfully moves for a continuance of the status conference scheduled for June 23, 2023, at 11:00 a.m. We request an approximately thirty-day adjournment of the hearing. The Government consents to the relief sought in this motion. In support, we proffer the following:

1. Since the last hearing, the parties have conferred several times to address Defendant's discovery requests.

2. On Thursday afternoon, June 15, 2023, the Government provided Defendant's counsel with a number of the items that had been requested in these discussions. However, we need additional time to review the items produced, most of which are video files, and to arrange for Defendant to review the items produced. Mr. Boughner recently has been moved from USP Lewisburg to the District of Columbia Correctional Treatment Facility, which will complicate this process. Additionally, more time is needed to allow the parties to discuss a potential resolution of the charges.

3. For the foregoing reasons, it is respectfully submitted that this motion should be

granted and the status hearing continued to a future date. Mr. Bougher waives the requirements of the Speedy Trial Act for the interim time period.

Dated: June 20, 2023

Respectfully submitted,

/s/ Barry Coburn

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of June, I caused this motion to be filed via the Court's electronic filing system (CM/ECF), which will serve copies upon all counsel of record.

/s/ Barry Coburn _____
Barry Coburn