

**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 July 25, 2023. 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. The government has been responsive and has provided us with substantial additional materials. However, administrative difficulties have arisen with respect to affording Mr. Boughner access to these materials at the District of Columbia Correctional Treatment Facility, where he is now housed. Accordingly, he has not yet reviewed them and we have not yet been able to have an informed discussion with him about them.
3. For the foregoing reasons, it is respectfully submitted that this motion should be

granted and the status hearing continued to a future date, approximately thirty days hence if that is consistent with the Court' schedule, to allow Mr. Boughner to review these additional materials and discuss them with us. Mr. Boughner waives the requirements of the Speedy Trial Act for the interim time period.

Dated: July 24, 2023

Respectfully submitted,

/s/ Barry Coburn

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of July, 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