

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

UNITED STATES OF AMERICA	:	Case No. 21-CR-126 (BAH)
	:	
v.	:	
	:	
TROY FAULKNER,	:	
	:	
Defendant.	:	
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**JOINT RESPONSE TO THE COURT’S MINUTE ORDER AND JOINT REQUEST TO
CONTINUE PLEA HEARING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the above defendant, by and through his counsel, John L. Machado, Esq., respectfully submit this Joint Response to the Court’s Minute Order and Joint Motion to Continue the Plea Hearing for approximately 30 days in the above captioned matter currently scheduled for a plea hearing on May 6, 2022. In support of this motion, the government relies on the following points and authorities and any other such points and authorities as may be raised at any hearing on this matter.

On April 27, 2022, the Court issued a Minute Order directing the parties to inform the Court by May 2, 2022, at 12:00 PM, “whether any outstanding plea offer will have expired by May 6, 2022, and if so, the parties shall provide the Court with three proposed trial dates and a proposed motions schedule in the same report, so that the Court may set a trial schedule at the May 6, 2022 hearing.” *See* Court’s Minute Order Dated April 27, 2022.

Undersigned counsel for the government can report that after numerous discussions that the final plea paperwork has been submitted to the supervisory team for approval. This final stage should be fully completed in the coming days. Accordingly, the government will extend its plea

offer to the defendant until June 30, 2022.

Undersigned counsel for the government can represent that counsel for the defendant joins in this motion and further advise the Court that the defendant agrees that the Speedy Trial Clock, pursuant to the Speedy Trial Act 18 U.S. Code § 3161, should be tolled until the next plea hearing in this matter.

In addition, because counsel for the defendant will need some time to review the written plea and proffer with the defendant, the parties request that the plea hearing be continued for approximately 30 days or whatever date is consistent with the Court's calendar.

If granted, the parties will reach out to the Court's courtroom deputy to obtain the available date(s) for the Court and parties.

Wherefore, the parties request the Court to continue this matter for approximately 30 days or whatever date is consistent with the Court's calendar.

Respectfully submitted,

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