

**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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UNOPPOSED MOTION TO CONTINUE THE PLEA HEARING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and unopposed by the above defendant, by and through his counsel, respectfully submit this Unopposed Motion to Continue the Plea Hearing for approximately 45-60 days in the above captioned matter currently scheduled for Friday, June 3, 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.

- 1) The Court previously set the plea hearing in this matter for June 3, 2022, at 10:00 a.m.
- 2) Because the government request additional time to complete the necessary plea paperwork and for the defendant to review the same, undersigned counsel for the government request that the plea hearing be continued for approximately 45-60 days or whatever date is consistent with the Court's calendar.
- 3) If granted, the parties will reach out to the Court's courtroom deputy to obtain the available date(s) for the Court and parties.
- 4) Undersigned counsel for the government can represent that counsel for the

defendant *does not oppose* 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.

6) Wherefore, the government request the Court to continue this matter for approximately 45-60 days or whatever date is consistent with the Court's calendar.

Respectfully submitted,

MATTHEW M. GRAVES
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