

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

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|---------------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA | : | |
| | : | |
| V. | : | CASE NO. 22-MJ-00184-05 |
| | : | |
| TYLER QUINTIN BENSCH, | : | |
| | : | |
| DEFENDANT. | : | |

**CONSENT MOTION TO CONTINUE STATUS CONFERENCE AND EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT**

The United States, through undersigned counsel, hereby files this motion to adjourn the status conference set for Thursday, April 13, 2023, in the above-captioned matter until Thursday, April 27, 2023. Counsel for defendant concurs in this motion. Counsel for defendant was in trial for several weeks before Judge Mehta. The trial concluded on March 20, 2023, and counsel immediately began preparing for another trial before Judge McFadden that was held the week of April 3. Counsel for defendant further advised that he continues to review pre-indictment discovery productions. Additionally, plea negotiations have been productive, and counsel for defendant requests additional time to fully discuss the discovery and the government's plea offer with his client.

The parties request that the Court exclude the time from April 13, 2023, until the next status conference, pursuant to 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar No. 481052

Date: April 11, 2023

By: /s/ *Melanie L. Alsworth*
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