

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal Action No. 21-22 (CKK)

CHRISTOPHER RAY GRIDER.

Defendant.

**DEFENDANT'S UNOPPOSED MOTION TO CONTINUE STATUS
CONFERENCE AND WAIVE TOLL SPEEDY TRIAL LIMITS**

TO THE HONORABLE COLLEEN KOLLAR-KOTELLY, UNITED STATES DISTRICT COURT JUDGE FOR THE DISTRICT OF COLUMBIA:

CHRISTOPHER RAY GRIDER, the Defendant in the above-styled and numbered cause, by and through undersigned counsel, moves this Court to continue the status conference presently scheduled for August 25, 2022 and continue to toll the speedy trial limits set out in 18 U.S.C. § 3161. In support thereof, Mr. Grider would show the following.

1. This Court last held a status conference on Mr. Grider's case on August 4, 2022. The parties represented to this Court that plea discussions have recommenced and the Court, by agreement of the parties, agreed to the scheduling of another status conference on August 25, 2022 to follow up on those discussions. *See* Minute Order of August 4, 2022.
2. On Monday, August 22, 2022, the Government conveyed a revised plea offer to counsel for Mr. Grider. Unfortunately, Mr. Grider's counsel is presently in a jury

trial in a state court in Texas and expects to be for the remainder of the week. This scheduling conflict prevents him from being able to have the necessary discussions with Mr. Grider concerning the proposed, revised plea agreement and whether to accept or reject it.

3. To permit an adequate opportunity to discuss this new plea agreement, counsel for Mr. Grider seeks a continuance of the status conference to the week of September 5, 2022 (not to include September 9, 2022).
4. Undersigned counsel conferred with counsel for the Government, Francesco Valentini, and confirmed he is not opposed to this motion. Both parties maintain that this motion is made not for the purpose of delay but in the best interests of justice.
5. Undersigned counsel has conferred with Mr. Grider regarding his speedy trial rights under the Speedy Trial Act, 18 U.S.C. § 3161 *et al.*, and he has no objection to the continued tolling of the time limits until the next scheduled status conference.

WHEREFORE, PREMISES CONSIDERED, Mr. Grider respectfully requests this Honorable Court continue the status conference presently scheduled for August 25, 2022 to the week of September 5, 2022 (not to include September 9, 2022) and continue to toll the speedy trial limits set out in 18 U.S.C. § 3161.

Date: August 23, 2022

Respectfully Submitted,

MAYR LAW, P.C.

by: /s/ T. Brent Mayr
T. BRENT MAYR
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ATTORNEY FOR THE DEFENDANT,
CHRISTOPHER RAY GRIDER

CERTIFICATE OF CONFERENCE

I certify that I conferred with Counsel for the Government, Francesco Valentini, and he is not opposed to this motion.

/s/ T. Brent Mayr
T. BRENT MAYR

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the Government, Francesco Valentini,, on August 24, 2022, via CM/ECF and email.

/s/ T. Brent Mayr
T. BRENT MAYR