

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

Case No.: 1:21-CR-312-JEB

UNITED STATES OF AMERICA,

v.

Motion to Continue Trial

BRADLEY BENNETT

Defendant.

The Defendant, Mr. Bennett, by and through Counsel, hereby moves the Court to CONTINUE the jury trial currently set to commence October 16, 2023, in the above-captioned case. In support of this motion, Mr. Bennett states the following:

1. On Friday, October 6, 2023, Mr. Bennett went into the emergency room for treatment. He was experiencing extreme pain, nausea, and muscle weakness. He was diagnosed with kidney stones and discharged from the emergency room. He was prescribed oxycodone-acetaminophen and tamsulosin.
2. Mr. Bennett has remained in extreme pain and went back to the emergency room on October 9, 2023. After testing, it was determined Mr. Bennett had large kidney stones. He was told he would need to schedule surgery to remove the stones later in the week.
3. Due to the tentative nature of Mr. Bennett's health condition, it is likely Mr.

Bennett would not be well enough to travel to Washington D.C. from his home in North Carolina to commence trial on October 16, 2023.

4. Both the Government and the defense currently have witnesses scheduled to testify at Mr. Bennett's trial. Many of the witnesses currently have flight and hotel reservations to accommodate the trial schedule.

5. The defense requests a continuance in the commencement of Mr. Bennett's trial. Such a continuance would avoid unnecessary flights and hotel stays and the possible inconvenience of witnesses. Further, a continuance prior to October 16, 2023, would allow an opportunity for the witnesses to avoid financial penalties for late cancellations.

6. The defense has conferred with the government, about the defense's request to continue Mr. Bennett's trial and the government does not object to this motion. Further, the defense and government request a new trial date to occur no earlier than January 15, 2024, due to the attorneys' previously scheduled trial dates and annual leave.

WHEREFORE, the defense respectfully requests the commencement of Mr. Bennett's trial be continued no earlier than January 15, 2024.

Respectfully submitted, this the 10th day of October, 2023.

/s/Leza Lee Driscoll
/s/Rosemary Godwin

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Certificate of Service

I certify the foregoing Defendant's Motion was served on the following via the Court's electronic filing system:

/s/Anna Z. Krasinski
ANNA Z. KRASINSKI
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This the 10th day of October, 2023.

/s/Leza Lee Driscoll
/s/Rosemary Godwin

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