

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

UNITED STATES OF AMERICA

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vs.

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Case No.: 21-cr-0069 APM

JORGE A. RILEY

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Defendant

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**CONSENT MOTION FOR CONTINUANCE AND EXCLUSION OF TIME
FROM CALCULATION UNDER THE SPEEDY TRIAL ACT**

COMES NOW, the Defendant Jorge A. Riley, by and through counsel, Michael E. Lawlor, William C. Brennan, Jr. and Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to continue the status conference currently scheduled for Tuesday, October 19, 2021, and exclude certain time from the Speedy Trial Act calculation in this case. In support of this Motion, counsel states the following:

1. Per prior Order of the Court, Mr. Riley is scheduled to appear before this Honorable Court on Tuesday, October 19, 2021 at 10:30 a.m. for a status conference in the above-referenced case.
2. For the following reasons, undersigned counsel respectfully asks for a two-week continuance of the status conference, and the exclusion of that time for Speedy Trial purposes, for the following reasons.

- a. The United States of America and counsel for Mr. Riley have begun negotiating a possible disposition in this matter;
- b. Undersigned counsel intends to continue discussions with the United States and Mr. Riley about a possible resolution in this case, but requires additional time to do so;
- c. Additionally, Mr. Lawlor has an unexpected travel commitment on the date and time of the hearing and co-counsel William Brennan also has a scheduling conflict.

3. Undersigned counsel has discussed this request with Mr. Riley, and is authorized to state that he is in agreement with the instant request, and consents to exclusion of time under the Speedy Trial Act.

4. Undersigned counsel has also contacted Assistant United States Attorney Troy A. Edwards, and is authorized to state that the United States does not oppose this motion.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests this Honorable Court continue the current status conference date for a period of approximately two weeks, and exclude that time from the Speedy Trial calculation in this case.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 18, 2021, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Columbia.

/s/

Michael E. Lawlor