

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

UNITED STATES OF AMERICA

VS.

DANIEL RAY CALDWELL

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CRIMINAL NO. 1:21-CR-00181

MOTION FOR CONTINUANCE OF PLEA DEADLINE

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW, Defendant, **DANIEL RAY CALDWELL**, in the above styles and numbered cause, by and through his attorney of record, John Hunter Smith and files this Motion for Continuance of Plea Deadlines, and in support thereof would show the court as follows:

I.

The above matter is presently set for Plea deadline on August 9, 2021.

II.

On June 17, 2021, the Government submitted the plea agreement to counsel via e-mail. The plea agreement provided by the Government expires on August 9, 2021. On August 6, 2021, counsel for the defendant filed a Motion To Withdraw As Counsel in (Doc. 26). Counsel requests that the deadline be extended to a later date to allow new counsel an opportunity to determine the course of action on the instant case.

III.

This motion is made in the interest of justice and not for any reason of delay.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully prays the Court

grant this Motion for Continuance.

Respectfully submitted,

/s/John Hunter Smith
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ATTORNEY'S FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I, hereby certify that on August 5, 2021, Counsel spoke with Assistant United States Attorney, James D. Peterson and he is not opposed to this motion.

/s / John Hunter Smith
JOHN HUNTER SMITH

CERTIFICATE OF SERVICE

I, hereby certify that on August 6, 2021, a copy of the foregoing motion was provided to Assistant United States Attorney, Mr. James D. Peterson by CM/ECF Pacer.

/s / John Hunter Smith
JOHN HUNTER SMITH

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ORDER ON MOTION FOR CONTINUANCE OF PLEA DEADLINE

CAME ON TO BE CONSIDERED the above and foregoing Order on Motion for
Continuance of Plea Deadline in the above-styled and numbered cause, and the same is hereby:

_____ GRANTED in all things,

_____ DENIED in all things.