

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, November 2, 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, November 2, 2021 at 11:00 a.m. for a status conference in the above-referenced case.

2. For the following reasons, undersigned counsel respectfully asks for a 30-day 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, there is ongoing production of discovery;
- d. Additionally, undersigned counsels are currently in a carryover trial in the Circuit Court for Carroll County in the matter of *State of Maryland v. John Joseph*, case no.: C06CR21000152.

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 30 days, 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 November 2, 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