

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

UNITED STATES OF AMERICA	:	
	:	
	:	
	:	Case No. 1:21-cr-00358-EGS-1
v.	:	Judge: Emmet G. Sullivan
	:	
HOWARD BERTON ADAMS,	:	
	:	
DEFENDANT.	:	

AGREED MOTION FOR CONTINUANCE

The United States of America, by and through the Acting United States Attorney for the District of Columbia, and defendant Howard Berton Adams, by and through his counsel listed below, hereby request that this Court grant a continuance and for good cause states:

1. A Status Conference Hearing is scheduled on May 11, 2022, at 2:30 p.m. in front of the Honorable Judge Emmet G. Sullivan.

2. This motion is brought for the convenience of the parties and witnesses and in the interests of justice. The consent and approval of counsel for the United States of America is indicated by the signature below.

3. Defendant waives his right to a speedy trial conditioned on the Court's granting of this Motion, because additional substantial discovery materials were recently provided by the government, which the defense needs to review, and because the defense needs further time to consider the government's plea offer.

WHEREFORE, the parties request that this Court grant a continuance in this matter setting the next Status Conference Hearing no later than forty-five (45) days from the date of this Motion.

CERTIFICATE OF GOOD FAITH

WE HEREBY CERTIFY that the foregoing Motion for Continuance is made in good faith and not for purposes of delay

Respectfully submitted,

Buckmaster and Ellzey

By: /s/ Jeremy J. Buckmaster

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Date: May 2, 2022

By: /s/ Michael C. Liebman

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	:	
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[PROPOSED] ORDER

On May ____, 2022, the Court considered the Agreed Motion for Continuance and,
IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

The Agreed Motion for Continuance is:

GRANTED

SO ORDERED.

The Court further finds that the interests of justice outweigh both the defendant’s and the public’s right to a speeding trial and that therefore the Speedy Trial Act clock shall be tolled until the next hearing in this matter, on _____, 2022.

Signed this _____ day of May 2022.

Emmet G. Sullivan
United States Judge