

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

UNITED STATES OF AMERICA :
 :
 v. : **Crim. No. 22-cr-86 (TFH)**
 :
 MICHAEL LEE ROCHE, :
 :
 Defendant. :

**UNOPPOSED MOTION TO CONTINUE AND
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, through the U.S. Attorney for the District of Columbia, requests that the arraignment currently scheduled for April 6, 2022 at 11:00 a.m. be continued until April 12, 2022 at 11:00 a.m., and that the Court exclude the time until that arraignment from the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). In support, the government submits as follows:

1. Government counsel is currently on trial in another matter before the Honorable Peter G. Sheridan, U.S.D.J. in the District of New Jersey, and is unavailable to appear before this Court for the arraignment currently scheduled for April 6, 2022. Trial is expected to conclude by April 8, 2022.

2. The Government has conferred with defense counsel concerning this motion, and defense counsel consents to the motion.

3. Wherefore, the government respectfully requests that this Court grant the motion for a continuance of the above-captioned proceeding, and that the Court exclude the time within which an indictment must be filed under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the

basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,

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