

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

UNITED STATES OF AMERICA

vs.

JEREMY DANIEL GROSECLOSE
Defendant

Case No. 1:21-cr-00311-CRC-1

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CONSENT MOTION TO VACATE TRIAL DATE

Jeremy Groseclose, by his undersigned counsel, hereby respectfully moves this Honorable Court to vacate the trial in this case, which is scheduled to begin on August 8, 2022. *See* Pretrial Order (ECF 34). The primary reason for the request is a scheduling conflict. AUSA Michael Romano consents to this request.

1. Trial in this case is scheduled for August 8, 2022.
2. Mr. Groseclose, who is on pretrial release, is in full compliance with the conditions of pretrial release set by the Court. *See* PSA Report (ECF 42, 5/11/22).
3. Undersigned counsel represents a defendant in a multi-defendant case, where all six defendants are detained pretrial, *United States v. Nordean*, Case No. 21-cr-175 (TJK). Some of the defendants have been detained for more than one year. The *Nordean* trial had to be moved when the government superseded to add two defendants and additional counts.
4. The first available date that could accommodate extensive discovery as well as the schedule of the *Nordean* parties is August 8, 2022, the same date as the instant case.¹ The *Nordean* trial could not otherwise have been scheduled until some time in 2023.

¹ Undersigned counsel informed Judge Kelly of the conflict with the instant case.

5. In addition, the Government continues to produce global discovery in the instant case.
6. Mr. Groseclose consents to vacating the trial date.
7. AUSA Romano consents to the request to vacate the trial date in this case.

WHEREFORE, Mr. Groseclose respectfully moves this Honorable Court to vacate the trial scheduled for August 8, 2022 trial.

Respectfully submitted,

/s/ Carmen D. Hernandez _____

Carmen D. Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that the instant Motion was served on all counsel of record 11th day of May, 2022 on all counsel of record via ECF.

/s/ Carmen D. Hernandez _____

Carmen D. Hernandez