

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

United States	)	
	)	
v.	)	NO. 1:21cr57
	)	
Nicholas Rodean	)	
	)	
Defendant.	)	

**CONSENT MOTION TO CONTINUE STATUS HEARING**

Comes now the accused, Nicholas Rodean, and moves to continue the status hearing scheduled for March 23. Mr. Rodean asserts as follows:

1. Mr. Rodean’s next status hearing is scheduled for March 23, 2022 at 3pm.
2. On March 17, the government filed a Motion for Reconsideration of this Court’s previous speedy trial rulings or, in the alternative, to advance the trial date. ECF 42.
3. This Court ordered Mr. Rodean to respond to the government’s motion by Friday, March 25.
4. Continuing Mr. Rodean’s status hearing until the week March 28 would allow the issues raised in the government’s recent filing to be fully briefed for the Court.
5. Counsel for the government does not object to this request. Counsel for both parties are available any time on March 28 or March 29.

For the foregoing reasons, Mr. Rodean respectfully requests a brief continuance of his upcoming status hearing until after the briefing on the government’s

Motion to Reconsider is complete.

Respectfully Submitted,

By:

*/s/ Charles Burnham*  
Charles Burnham VSB # 72781  
*Attorney for the Accused*  
Burnham & Gorokhov, PLLC  
1424 K St. NW, Suite 500  
Washington, DC 20005  
(202) 386-6920 (phone)  
(202) 765-2173  
charles@burnhamgorokhov.com

**CERTIFICATE OF SERVICE**

I have served this filing on the government through the ecf system.

Respectfully Submitted,

By: /s/ Charles Burnham  
Charles Burnham VSB # 72781  
*Attorney for the Accused*  
Burnham & Gorokhov, PLLC  
1424 K St. NW, Suite 500  
Washington, DC 20005  
(202) 386-6920 (phone)  
(202) 765-2173 (fax)  
charles@burnhamgorokhov.com

