

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

**UNITED STATES OF AMERICA** :  
 :  
 **v.** : **Case No. 21-cr-367-RDM**  
 :  
 **JALISE MIDDLETON, and** :  
 **MARK MIDDLETON,** :  
 :  
 **Defendants.** :

**UNOPPOSED JOINT MOTION TO CONTINUE**

The United States hereby files this joint request for a continuance. Undersigned counsel represents the following:

**I.**

This case is currently set for April 11, 2022, for a change of plea hearing.

**II.**

The parties jointly request that the change of plea hearing be converted to a status hearing, and be continued from April 11, 2022, to May 10, 2022, at 11:00 am EDT. Defendants understand and waive their speedy trial right until May 10, 2022. The parties further consent to the status hearing proceeding remotely via Zoom.

**III.**

This request for a continuance is not for purposes of delay, but so that justice may be done. It will also allow the parties to continue discussing alternative resolutions to this case, potentially short of trial.

**IV.**

Counsel for the United States has conferred with counsel for Defendants, who do not oppose the continuance.

joint motion to continue this case to the date requested.

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney  
D.C. Bar No. 481052

By:           /s/ Brian P. Kelly  
BRIAN P. KELLY  
Assistant United States Attorney  
United States Attorney's Office  
District of Columbia  
D.C. Bar No. 983689  
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**CERTIFICATE OF CONFERENCE**

I, Brian P. Kelly, hereby certify that on April 8, 2022, I conferred with Phillip Linder and James Lee Bright, counsel for Defendants, on the above-referenced Unopposed Joint Motion to Continue and they indicated they had no objection to the granting of this Unopposed Joint Motion to Continue.

          /s/ Brian P. Kelly  
Brian P. Kelly

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of this document has been forwarded to all counsel via ECF, on this 8th day of April 2022.

          /s/ Brian P. Kelly  
Brian P. Kelly

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 Defendants. :

**[PROPOSED] ORDER GRANTING**  
**UNOPPOSED JOINT MOTION TO CONTINUE**

This matter having come before the Court pursuant to an Unopposed Joint Motion to Continue the above-referenced case,

IT IS HEREBY ORDERED that the Motion is GRANTED. The Court orders the change of plea hearing to be converted to a status hearing, and for the status hearing to be continued from April 11, 2022, to May 10, 2022, at 11:00 am EDT.

Date:

\_\_\_\_\_  
RANDOLPH D. MOSS  
UNITED STATES DISTRICT JUDGE