

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>CRIMINAL NO. 21-cr-367-RDM</b>
	:	
<b>JALISE MIDDLETON, and</b>	:	
<b>MARK MIDDLETON,</b>	:	
	:	
<b>Defendants.</b>	:	

**UNOPPOSED JOINT MOTION TO CONTINUE**

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

At a status hearing on May 10, 2022, this case was set for trial from December 13 to 20, 2022. Since then, the government learned that a key witness has a preexisting family obligation during that period, and would be unable to testify at trial. The witness is critical to the government's case.

As such, the government requests that the trial dates be rescheduled to January 23 to 30, 2023. Counsel for the United States has conferred with counsel for Defendants, who do not oppose the continuance. Defendants also understand and waive their speedy trial rights until January 23, 2023. This request for a continuance is not for purposes of delay, but so that justice may be done.

WHEREFORE, the United States respectfully requests that the Court grant this unopposed joint motion to continue the trial in 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  
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**CERTIFICATE OF CONFERENCE**

I, Brian P. Kelly, hereby certify that on May 11, 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.

By: /s/ Brian P. Kelly  
BRIAN P. KELLY  
Assistant United States Attorney  
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**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 13th day of May 2022.

By: /s/ Brian P. Kelly  
BRIAN P. KELLY  
Assistant United States Attorney  
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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 trial in this matter to be continued from December 13, 2022, to January 23, 2023.

Date:

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