

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-498 (CJN)
	:	
ANDREW TAAKE,	:	
	:	
	:	
Defendant.	:	

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

The United States of America hereby moves this Court for a 30-day continuance of the August 25, 2023 status conference scheduled in the above-captioned matter, and further to exclude the intervening time under the Speedy Trial Act. In support of its motion, the government represents:

1. On July 25, 2023, this Court held a status conference during which the parties informed the court that though they were close to resolving this matter by way of a plea agreement, the D.C. Circuit had yet to rule on the government's Unopposed Motion for Summary Reversal filed on July 3, 2023 in *United States v. Taake*, No. 22-3071. In light of this, the Court scheduled a status conference for August 25, 2023, with instructions to the parties to inform the Court if the D.C. Circuit ruled on the government's motion prior to the August 25th status conference.
2. As of August 23, 2023, the D.C. Circuit had not ruled on the government's motion.
3. Government counsel discussed the continuance of the August 25th status conference with counsel for the defendant and they are unopposed.

4. Government counsel believes it is in the interest of justice to toll the Speedy Trial Act while we wait for the D.C. Circuit to rule on the government's pending motion. The government thus requests a tolling of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), based on the factors described in 18 U.S.C. § 3161(h)(7)(B)(i), (ii), and (iv).
5. Therefore, the government requests that the August 25, 2023 status conference be continued for approximately 30 days, and that there is an exclusion of time under the Speedy Trial Act from August 25, 2023 through the next scheduled status conference.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

By: /s/ Madison H. Mumma
Madison H. Mumma
Trial Attorney (Detailee)
N.C. Bar No. 56546
601 D. St NW
Washington, DC 20001
202-431-8603
Madison.mumma2@usdoj.gov