

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

CR. NO. 1:21-CR-00367

JALISE MIDDLETON,
Defendant.

MOTION TO VACATE TRIAL DATE

Comes now counsel for the defendant, JALISE MIDDLETON, and moves this Honorable Court to vacate the trial date in the above-captioned matter. In support of which, counsel states the following:

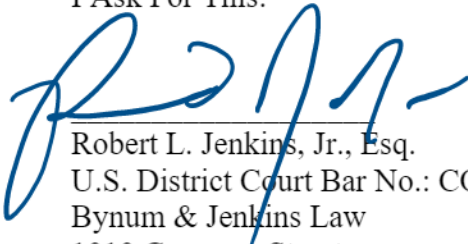
1. This matter is currently set for a jury trial on January 23, 2023.
2. On or about September 26, 2022, undersigned counsel was appointed as substitute counsel for the defendant's retained counsel.
3. Since counsel's appointment he has diligently worked to obtain prior counsel's file, and discovery. Counsel has endeavor to familiarize himself with the facts and the law which apply to this matter.
4. Due to delays beyond counsel's control, prior counsel's file was not received until several weeks after his initial request. The file contains a voluminous amount of discovery and other materials. In order to adequately prepare for trial counsel must become familiar with the contents of the file. The size of the file makes is virtually impossible for counsel to review and be prepared for trial on the current date.
5. On September 29, 2022, counsel conferred with the defendant concerning the instant motion as well as her rights pursuant to the Speedy Trial Act. The defendant concurs

with the filing of this request. Further, the defendant does not object to exclusion of time from the Speedy Trial calculation.

6. The granting of this instant motion would be in the interest of justice.
7. The granting of the instant motion would protect the defendant's Sixth Amendment right to the effective assistance of counsel.
8. The granting of the insane motion would protect the defendant's Fifth Amendment right to due process.
9. Counsel has conferred with government counsel concerning this request. The government does not oppose the granting of the instant motion.
10. Counsel has conferred with counsel for the co-defendant in this matter. He does not oppose the granting of the instant request.

Wherefore, counsel for the defendant JALISE MIDDLETON, moves this Honorable Court to vacate the current January 23, 2023 trial date in the above-cited matter.

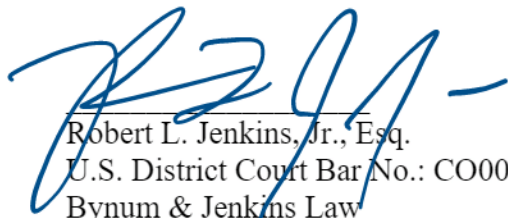
I Ask For This:



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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and accurate copy to be served on all counsel of record via ECF on this October 24, 2022.



Robert L. Jenkins, Jr., Esq.

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