

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)	
)	
v.)	USDC No. 21-cr-503 (RCL)
)	
Glenn Allen Brooks, <i>defendant</i> .)	

JOINT MOTION TO CONTINUE STATUS HEARING
AND TO WAIVE TIME UNDER THE SPEEDY TRIAL ACT

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., (“counsel”) appointed by this Court under the Criminal Justice Act, jointly with the United States, move the Court to continue the status hearing from October 11, 2022 at 12:30 p.m. to a date approximately forty-five (45) days hence, and to waive the intervening time under the Speedy Trial Act, for the following reason:

In an effort to resolve this case without a trial, the defendant has sought and the government has agreed to prepare a “reverse proffer” of the evidence in this case for the defendant to consider. The parties believe that such a proffer may lead to a pretrial resolution of the charges. The government needs additional time in which to prepare its presentation, and would not be able to complete it before October 11, 2022, the date currently set for a status conference. At that conference, the defendant would not be prepared to advise the Court whether or not he would accept a plea agreement.

The parties request that the next hearing be in-person, as have the previous status conferences before this Court. The parties submit that these efforts to reach a resolution of the charges without a trial will serve the interests of justice, and therefore waive the time between October 11, 2022, and the next court date under the Speedy Trial Act.

A proposed Order is attached.

WHEREFORE, the defendant respectfully moves the Court to grant said relief.

This pleading is,

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Joseph S. McFarlane, Esq., U.S. Dept. of Justice (USAO-DC), attorney of record for the government in the instant case, this 4th day of October, 2022.

/s/

Nathan I. Silver, II