

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

<b>UNITED STATES OF AMERICA</b>	:	<b>Case No. 21-CR-108 (TSC)</b>
	:	
<b>v.</b>	:	
	:	
<b>MICHAEL JOSEPH FOY,</b>	:	
	:	
<b>Defendant.</b>	:	

**UNOPPOSED MOTION TO CONTINUE THE STIPULATED TRIAL HEARING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and unopposed by the above defendant, by and through his counsel, Elizabeth Mullin, Esquire, moves this Court to continue the Stipulated Trial Hearing for the defendant for approximately 30 days or whatever date is consistent with the Court’s calendar. In support of this motion, the government relies on the following points and authorities and any other such points and authorities as may be raised at any hearing on this matter.

- 1) The Court previously set the Stipulated Trial Hearing in this matter for May 22, 2023.
- 2) The government needs additional time to submit the finalized proposed Stipulated Trial paperwork to counsel for the defendant. After which, counsel for the defendant may need a very brief period of time to finalize any additional terms of the Stipulated Trial. Therefore, based on this unopposed motion to continue the Stipulated Trial Hearing for approximately 30 days or whatever date is consistent with the Court’s calendar.
- 3) If granted, the parties will reach out to the Court’s courtroom deputy to obtain the available date(s) for the Court and parties.
- 4) Please note that counsel for the defendant is not available on the following dates -

June 23, 2023 to July 5, 2023.

4) Consequently, the parties agree that it is in the interest of justice to continue this matter for approximately 30 days, and thus request an exclusion of time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A).

5) Wherefore, the government request in this unopposed motion that the Court continue this matter for approximately 30 days or whatever date is consistent with the Court's calendar.

Respectfully submitted,

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UNITED STATES ATTORNEY

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