

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	Criminal No. 21-190 (DLF)
v.)	Judge Friedrich
)	Motions Hearing: May 31, 2023
ZACHARY ALAM)	

UNOPPOSED MOTION TO CONTINUE MOTIONS HEARING

COMES NOW the defendant, Zachary Alam, by and through undersigned counsel, and respectfully moves this Honorable Court to continue the motions hearing in his case from May 31, 2023 to any day in the last two weeks or June 2023 that is available to the Court. In support of this motion, Mr. Alam would show:

1. The motions hearing in this case is currently scheduled for May 31, 2023. Trial is scheduled to start on July 31, 2023.
2. Undersigned counsel's schedule has become very congested during the month of May. Among other things, counsel has an appellate brief due in the United States Court of Appeals for the District of Columbia Court of Appeals on May 31, 2023—the same day as the motions hearing in this case.
3. Mr. Alam is currently being held by the United States Marshal Service at USP Lewisburg in Lewisburg, Pennsylvania. Undersigned counsel feels he needs to visit with Mr. Alam before the motions hearing. It will be difficult for counsel to visit Mr. Alam before May 31, 2023 with his current schedule.
4. In order to accommodate undersigned counsel's schedule and foster the attorney-client relationship between Mr. Alam and counsel, counsel is requesting that the motions hearing be continued from May 31, 2023 to a later date.

5. Undersigned counsel has consulted with Assistant United States Attorney Rebeka Lederer and Assistant United States Attorney Joseph Smith about continuing the motions hearing in this case to a later date. Government counsel have graciously indicated they do not oppose such a continuance and have indicated they are both available to do the hearing any day in the last two weeks of June 2023.

6. Given the above, Mr. Alam requests that, if possible, the Court continue his motions hearing from May 31, 2023 to any day during the last two weeks of June 2023 that is available to the Court

CONCLUSION

WHEREFORE, the defendant, Zachary Alam, moves this Honorable Court to continue the motions hearing in his case from May 31, 2023 to any day in the last two weeks or June 2023.

Respectfully submitted,

/s/

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