

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

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**UNITED STATES OF AMERICA,**

*Plaintiff,*

**-v-**

**Case No. 22-CR-00170  
HON. COLLEEN KOLLAR-KOTELLY**

**TREVOR BROWN,**

*Defendant.*

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**Stipulation to Continue  
Status Conference Date**

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The parties stipulate to continue the status conference date of February 17, 2023, as currently scheduled, for approximately an additional 10 days, during the week of February 27, 2023. The parties further stipulate, and jointly move for the Court to find, that the time period between February 17, 2023 and the new status conference date set by the court, qualifies as excludable delay under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), because the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and the defendant in a speedy trial. The parties' reasons for the continuance and for a finding of excludable delay are as follows:

- The defendant's counsel will be out of town and unavailable for the status conference on February 17, 2023.
- The next period of time that counsel for the defense and counsel for the government are both available is the week of February 27, 2023.
- As a result, failure to grant a continuance could lead to absence of counsel and thereby make a continuation of the proceeding impossible and result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(7)(B)(i).

The parties therefore request that the Court grant a continuance of the status conference and further find that the delay caused by this continuance should be deemed excludable time under 18 U.S.C. § 3161(h)(7)(A) because the ends of justice served by the granting of this continuance outweigh the best interests of the public and the defendant in a speedy trial.

**IT IS SO STIPULATED.**

Respectfully submitted,

*s/Craig E. Estes (w/consent)*

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