

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	CASE NO. 1:21-cr-00553-RJL
v.	:	
	:	
THOMAS BALLARD,	:	
	:	
Defendant.	:	

**UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE AND TOLLING OF
THE SPEEDY TRIAL ACT**

The United States respectfully files this unopposed motion for to continue the status conference currently set for February 2, 2023 at 4:00 p.m. for approximately thirty days and a tolling of the Speedy Trial Act until a new status or plea date has been scheduled.

In support of this motion the government sets forth the following:

1. The parties have been in plea negotiations and a proposed plea agreement has recently been extended to the defendant.
2. A continuance is requested to afford counsel for the defendant the opportunity to consult with the defendant regarding the proposed plea agreement and to advise the court as to the status of the case.
3. It is in the interest of justice to toll the Speedy Trial Act until the new status conference or plea date. The government therefore request a tolling of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), based on the factors described in 18 U.S.C. 3161(h)(7)(B)(i) and (iv) and request an exclusion of time under the Speedy Trial Act from February 2, 2023, through the new status conference date or plea date.

Respectfully submitted,
MATTHEW M. GRAVES

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion, along with the proposed sealed documents and the proposed order granting this motion, are being served on defense counsel via email on July xx, 2022.

/s Barry K. Disney_____