

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-562-RC
	:	
BENJAMIN MARTIN,	:	
	:	
Defendant.	:	

**CONSENT MOTION TO VACATE, CONTINUE, AND
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America hereby moves this Court vacate the July 11, 2022 status hearing scheduled in the above-captioned matter, for a continuance of the above-captioned matter, until October 27, 2022 at 2:00 p.m., and further to exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). In support of its motion, the government states as follows:

Defense counsel was recently appointed to the case and discovery is voluminous. Mr. Martin requires additional time to review the discovery, investigate and research possible defenses, research potential pretrial motions, and explore potential resolutions to the case, and otherwise prepare for trial.

Counsel for the defendant consents to this motion.

WHEREFORE, the government respectfully requests that this Court grant the motion to vacate the scheduled status hearing, grant a continuance of the above-captioned proceeding to October 27, 2022, and that the Court exclude the time within which the trial must commence under

the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,

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