

**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 September 28, 2022 status hearing scheduled in the above-captioned matter, for a continuance of the above-captioned matter, for 60 days, 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:

New counsel was recently appointed for the defendant, and additional time is needed to fully review discovery, meet with the defendant, and discuss possible resolutions of this case with the government. 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 60-day continuance of the above-captioned proceeding, 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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By: /s/ Andrew J. Tessman

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