

**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 90 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:

Discovery has been produced, and the parties are engaged in ongoing plea discussions. The defendant is also charged in a firearms-related case in the Eastern District of California arising out the execution of the residential search warrant in this case. Defense counsel requires additional time to fully review discovery in both cases, meet with the defendant, and discuss possible resolutions of the cases 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 90-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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