

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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|---------------------------------------|---|--------------------------|
| United States of America |) | |
| |) | |
| v. |) | USDC No. 21-cr-649 (EGS) |
| |) | |
| Michael Dickinson, <i>defendant</i> . |) | |

UNOPPOSED MOTION TO CONTINUE STATUS HEARING

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., (“counsel”) appointed by this Court under the Criminal Justice Act, respectfully moves the Court, with no opposition from the United States, to continue the status hearing set for April 12, 2022 at 10:00 a.m. for a period of approximately sixty (60) days, to a date convenient with the Court and the parties, for the reasons that follow.

The parties have been discussing a possible resolution of the case with a plea agreement. The defendant has provisionally accepted the proposed terms of the agreement. For its part, the government must obtain other, necessary information before it can extend a formal offer and prepare its Statement of Offense. It is to afford the government time in which to do that and the defendant an opportunity to review a final proposal that the parties seek a continuance. It is, the parties submit, in the interests of justice to continue the matter for further status.

The parties believe that a continuance of forty-five (45) days will be sufficient to serve these ends.

The defendant, after having been advised by counsel, hereby waives, as does the United States, the time between April 12, 2022, and the next court date the time under the Speedy Trial Act.

A proposed Order is attached.

WHEREFORE, the defendant respectfully moves the Court to grant said relief.

This pleading is,

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Laura E. Hill, Esq., DOJ-USAO, attorney of record for the government in the instant case, this 5th day of April, 2022.

/s/

Nathan I. Silver, II