UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)	
)	
V.)	USDC No. 21-cr-649 (EGS)
)	
Michael Dickinson, defendant.)	

JOINT MOTION TO CONTINUE STATUS HEARING

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., ("counsel") appointed by this Court under the Criminal Justice Act, jointly with the United States, moves the Court to continue the status hearing now set for June 1, 2022 at 1 p.m. for a period of approximately thirty to forty-five days, to a date convenient with the Court and the parties, for the reason that follows.

The parties have provisionally reached an agreement to resolve this case without a trial. The basic terms have been established and the government has recently obtained information regarding the identity of its officers that was necessary to a disposition. The government plans to prepare and submit to undersigned counsel for the defendant's approval a Plea Agreement and Statement of Offense. It will also prepare a criminal Information which will in effect supersede the existing indictment in the case. The defendant, if and when he accepts the agreement, will waive indictment on the charge or charges in the Information.

Were the Court to conduct a status hearing as scheduled on June 1, 2022, the advisory provided above would be the sum and substance presented at the hearing. Thus, it would be an unnecessary use of judicial resources to conduct a hearing.

The defendant, after having been advised by counsel, hereby waives, as does the United States, the time between June 1, 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/

NATHAN I. SILVER, II Unified Bar #944314 6300 Orchid Drive Bethesda, MD 20817 (301) 229-0189 (direct) (301) 229-3625 (fax) email: nisquire@aol.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Barry K. Disney, Esq., Trial Attorney, Capital Case Section, U.S. Dept. of Justice., attorney of record for the government in the instant case, this 27th day of May, 2022.

/s/ Nathan I. Silver, II