

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America )  
 )  
 v. ) USDC No. 21-cr-620 (BAH)  
 )  
 Anthony Vuksanaj, *defendant.* )

UNOPPOSED MOTION TO CONTINUE STATUS HEARING

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., 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 Dec. 17, 2021 at 9:35 a.m. for a period of approximately thirty (30) days, to a date convenient with the Court and the parties, for the reasons that follow.

1. The defendant is charged in a four-count information with misdemeanor offenses arising from the breach of the U.S. Capitol on January 6, 2021.
2. The government extended a plea offer to the defendant on Nov. 30, 2021. The plea offer is open for the defendant to accept until December 30, 2021. Counsel provided the documents to the defendant that day for his review. Counsel has not been able to complete reviewing those documents with his client, answering any questions he might have, and advising him of the consequences of a plea of guilty. Counsel hopes to complete that review soon but cannot assure the Court that the defendant will have decided by Dec. 17, the date of the status hearing, whether or not he wishes to accept the offer.
3. Counsel advises the Court, *per* its Standing Order (¶7, page 2) in this case filed Oct. 8, 2021 (Doc. 11) as follows: (a) Original date of hearing: Dec. 17, 2021 @ 9:30 a.m.; (b) No

previous extensions requested or granted; (c) Good cause: That the parties will likely not be able to advise the Court by December 17, 2021, whether or not the defendant will accept the government's plea offer and therefore, in the interests of judicial efficiency, it will preserve the Court's resources by not convening a hearing while the plea offer remains open but not accepted or rejected, and (d) No other deadlines are involved, so no possible effect.

For these stated reasons, the defendant submits, with no opposition from the United States, that the status hearing now set should be vacated, to be rescheduled in approximately thirty (30) days, on a day convenient to the Court and parties.

For the record, in the interests of justice, the defendant waives, as does the United States, the time between Dec. 17, 2021, 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 Alison Prout, Esq., United States Department of Justice (U.S. Attorney's Office for the Northern District of George), attorney of record for the government in the instant case, this 13th day of December, 2021.

/s/

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*Nathan I. Silver, II*