

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA** :  
 : **Case No. 1:22-cr-110 (RC)**  
 **v.** :  
 :  
 **MATTHEW THOMAS KROL** :  
 :  
 **Defendant.** :

**CONSENT MOTION TO CONTINUE AND  
EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America hereby moves this Court vacate the November 29, 2022 status hearing scheduled in the above-captioned matter, for a 30-day continuance of the above-captioned matter, 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:

The parties are engaging in ongoing discussions regarding possible pre-trial resolutions of this case. Defense counsel's contact with his client has been limited by the defendant's pre-trial detention. While the discussions relating to disposition are positive, the parties are not yet in agreement on resolution. A continuance of 30 days would help facilitate resolution and provide additional time for defense counsel to communicate with his client.

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 30-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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