

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

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

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

The United States of America hereby moves this Court vacate the January 9, 2023 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 government has extended its final written plea offer to resolve this case before a trial. Defense counsel needs to meet in-person with his client to thoroughly discuss the offer. However, contact with the defendant has been limited by the defendant’s pre-trial detention. A continuance of 30 days would help facilitate pre-trial resolution and provide the additional time for defense counsel to meet with his client in-person.

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,

MATTHEW M. GRAVES  
United States Attorney  
D.C. Bar Number 481052

By: /s/ Andrew J. Tessman  
ANDREW J. TESSMAN  
Assistant United States Attorney  
District of Columbia – Detailee  
WV Bar No. 13734  
300 Virginia Street  
Charleston, WV 25301  
(304) 345-2200  
[Andrew.Tessman@usdoj.gov](mailto:Andrew.Tessman@usdoj.gov)