

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America )  
 )  
 v. ) USDC No. 22-crj-239 (RBW)  
 )  
 Paul Kovacik, *defendant* )

UNOPPOSED MOTION TO CONTINUE STATUS HEARING  
AND TO WAIVE TIME UNDER THE SPEEDY TRIAL ACT

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., (“counsel”) appointed by this Court under the Criminal Justice Act, moves the Court, jointly with the United States, to continue the status hearing from October 28, 2022, at 11:30 a.m., for a period of approximately forty-five (45) days, for the following reason.

The government has provided additional case-specific discovery to the defendant since the parties last status hearing. The most recent materials were provided on Oct. 19, 2022. Counsel has out-of-town travel plans during this week and will not be able to review the materials or further consult with his client in the meantime, about either a possible disposition short of trial, or a trial on the charges in the instant case. Thus, at the status hearing, the defendant would in any event be requesting more time in which to discharge these responsibilities.

The defendant, through counsel, has contacted asst. U.S. Attorney Douglas S. Meisel, attorney of record for the government, who advises that the government does not oppose the defendant’s request for a continuance of forty-five (45) days, so long as the defendant waives the time between Oct. 28, 2022, and the next court date under the Speedy Trial Act. The defendant herein advises the Court that he waives the time so specified under the Speedy Trial Act.

The parties waive the tolling of time between October 28, 2022 and the next court date under the Speedy Trial Act because they believe it will serve the interests of justice, as well as conserve the resources of the Court..

The parties request that the next hearing be conducted remotely by video teleconference, as permitted by the CARES Act per the standing order of Chief Judge Howell.

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 Douglas S. Meisel, Esq., U.S. Dept. of Justice (CRM), attorney of record for the government in the instant case, this 24th day of October, 2022.

/s/

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*Nathan I. Silver, II*