## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, :

:

v. : Case No. 1:22-cr-0080-EGS

:

JOSHUA JOHNSON, :

Defendant. :

## CONSENT MOTION FOR CONTINUANCE OF THE STATUS HEARING SCHEDULED FOR JUNE 8, 2022

Comes now Defendant Joshua Johnson, by and through counsel, to request the entry of an Order continuing the status hearing scheduled for June 8, 2022, to a date convenient to the Court and to the parties.

As grounds, the following is stated:

- 1. This motion is consented to, per Assistant U.S. Attorney Alexis Loeb.
- 2. A status hearing (VTC) is scheduled for June 8, 2022, at 1:30 p.m.
- 3. Counsel for Mr. Johnson is requesting the continuance due to personal reasons, which counsel has discussed with both Mr. Johnson and with AUSA Loeb.
- Grant of this motion to continue th June 8<sup>th</sup> status hearing should not affect the orderly administration of the Court's business.
- 6. Counsel has discussed with Mr. Johnson his right to a speedy trial, pursuant to the Speedy Trial Act. Mr. Johnson waives his right to assert a speedy trial, for the period of time between June 8th, 2022, and the "new" date for a sentencing hearing. This exclusion of time pursuant to the Speedy Trial Act is also

justified because of on ongoing plea negotiations, as well the ongoing production of

voluminous discovery materials in this January 6<sup>th</sup> case.

7. The following dates are "bad dates" for counsel: The entire week of

June 13-17, 2022, afternoon (1 - 4 p.m.) of June 21, 2022, morning (9 - 10:30 a.m.) of

June 23, 2022, afternoon (Noon - 3 p.m.) of June 24, 2022, June 30 to July 11, 2022,

morning (10 -11 a.m.) of July 15, 2022, and morning (10 - Noon) of July 18, 2022.

WHEREFORE, for the foregoing reasons and such other reasons that may

appear just and proper, defendant Joshua Johnson requests the entry of an Order

continuing the status hearing scheduled for June 8, 2022, to a date convenient to

the Court and to the parties.

Respectfully submitted,

Allen H. Orenberg, #395519

The Orenberg Law Firm, P.C.

12505 Park Potomac Avenue, 6th Floor

Potomac, Maryland 20854

Tel. No. (301) 984-8005

Fax No. (301) 984-8008

Cell-phone (301)-807-3847

aorenberg@orenberglaw.com

Counsel for Joshua Johnson

Dated: May 23, 2022

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