

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

<b>UNITED STATES OF AMERICA</b>	:	<b>Case No.: 22-CR-00010 (RJL)</b>
	:	
<b>v.</b>	:	<b>18 U.S.C. § 231(a)(3)</b>
	:	
<b>AVERY MACCRACKEN,</b>	:	
	:	
<b>Defendant.</b>	:	
	:	

JOINT MOTION TO CONTINUE PLEA CONFERENCE

For the reasons stated below, and without objection from the government, as counsel for Mr. MacCracken, I write to request a continuance of the July 11, 2023, plea conference.

I have been engaged at trial in the case of *United States v. Nizar Trabelsi*, 06 Cr. 89 (RDM). Trial started on May 8, 2023, and has continued to July 11, 2023. Summations are today and I do apologize for the inconvenience caused to the Court, the government and others. I ask the Court to set a plea date for a date 45 days out – as Mr. MacCracken lives in Colorado and needs the time to finance the trip from Colorado to the District of Columbia.

Time is properly excluded under the Speedy Trial Act because the parties continue to engage in plea discussions. Excluding time will best serve the ends of justice and outweigh the best interests of the parties in a speedy trial, because it will allow the matter to be resolved by plea. See, 18, United States Code, section 3161(h)(1)(D) and 3161 (h)(7)(A).

Respectfully submitted,

A. J. Kramer  
Federal Public Defender for the District of Columbia

/s/Michelle Peterson, Chief, AFPD  
625 Indiana Ave., N.W., Suite 550  
Washington, D.C. 20004  
(202) 208-7500, ext. 130

Sabrina Shroff  
Counsel to Avery MacCracken  
80 Broad Street, 19<sup>th</sup> Floor  
New York, New York 10004

Dated: July 11, 2023