

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

UNITED STATES OF AMERICA

v.

TIM LEVON BOUGHNER,

Defendant.

Case No. 22-cr-0020 (TSC)

DEFENDANT'S CONSENT MOTION TO CONTINUE STATUS HEARING

Defendant Tim Levon Boughner, through counsel, respectfully moves for a continuance of the status conference scheduled for February 6, 2023, at 9:30 a.m. We request an approximately sixty-day adjournment of the hearing. The Government consents to the relief sought in this Motion. In support, we proffer the following:

1. On Monday, January 23, 2023, we began a civil jury trial before the Honorable Judge Puig-Lugo in the Superior Court of the District of Columbia. The trial was expected to last three to four days. However, it lasted significantly longer than anticipated and did not conclude until Tuesday, January 31, 2023. The trial was all-consuming, making us unavailable to prepare for the hearing in the instant case. In addition, we have a lengthy reply brief due in a complex civil arbitration, which is related to a criminal case pending in this Court, on Monday, February 6, 2023. Accordingly, we need additional time to review the voluminous discovery in this case and to talk with the government about a potential pretrial resolution of the charges.

2. For the foregoing reasons, it is respectfully submitted that this motion should be granted and the status hearing continued to a future date. Mr. Boughner waives the requirements of the Speedy Trial Act for the interim time period.

Dated: February 1, 2023

Respectfully submitted,

/s/ Barry Coburn

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of February, 2023, I caused the foregoing to be filed with the Court's electronic filing system (CM/ECF), which will serve copies upon all counsel of record.

/s/ Barry Coburn

Barry Coburn