

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Case No. 1:22-cr-162</b>
	:	
<b>WILLIAM HENDRY MELLORS</b>	:	
	:	
<b>Defendant.</b>	:	

**AMENDED MOTION TO VACATE, CONTINUE AND  
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America hereby moves this Court to vacate and continue the January 26, 2023 status conference for 30 days, 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:

Discovery has been produced but is continuing due to the discovery of additional potential witnesses. The parties are presently engaging discussions regarding pre-trial resolution. However, no resolution has been reached. Counsel for the defendant need additional time to fully review discovery, meet with their client, and discuss possible pre-trial resolutions of this case. The parties agree that a continuance of 30 days will help facilitate counsel’s objectives. Counsel for the defendant consents to the continuance, and the tolling of the Speedy Trial Act until the next status conference date.

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,

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