

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 1:22-cr-151 (GMH)**
 :
JOHN THOMAS GORDON :
 :
 Defendant. :

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

The United States of America hereby moves this Court vacate the July 28, 2022 preliminary hearing scheduled in the above-captioned matter, and set a status conference in 60 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:

The parties are engaging in initial discussions regarding production of discovery in this matter. The undersigned counsel is authorized to state that the counsel for the defendant has agreed to waive the preliminary hearing set for July 28, 2022 in this case and agrees that a status conference should be set in its place in 60 days. Additionally, counsel for the defendant consents to 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 60-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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