

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

UNITED STATES OF AMERICA	:	Case No: 22-mj-179
	:	
v.	:	
	:	
SHAWNDALE CHILCOAT	:	
	:	
and	:	
	:	
DONALD CHILCOAT,	:	
	:	
Defendants.	:	

**CONSENT MOTION TO CONTINUE PRELIMINARY HEARING
AND EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States, through undersigned counsel, hereby files this motion to adjourn the preliminary hearing set for Shawndale Chilcoat on September 6, 2022, in the above-captioned matter, for at least 7 days, until September 13, 2022. Defense counsel for Shawndale Chilcoat consents to this motion. We request the additional time because the parties need additional time to consider and discuss any potential pre-indictment resolution and gather and produce any pre-indictment discovery.

The parties request that the Court exclude the time until the preliminary hearing is scheduled, pursuant to 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).

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar No. 481052

Date: August 30, 2022

By: /s/ Ashley Akers
Ashley Akers
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CERTIFICATE OF SERVICE

On this 30th day of August, a copy of the foregoing was served on counsel of record for the defendant via the Court's Electronic Filing System.

By: /s/ Ashley Akers

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