

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 1-22-mj-56
	:	
JOHN GOULD	:	
	:	
_____	:	

UNOPPOSED MOTION TO CONVERT PRELIMINARY HEARING TO STATUS

Mr Gould hereby moves this Court for to convert the currently scheduled preliminary hearing to status in the above-captioned proceeding. In support of this motion, the Mr Gould states as follows:

1. Mr Gould is before the Court charged by Complaint with one count each of violations of: 18 U.S.C. § 1752(a)(1), 18 U.S.C. § 1752(a)(2), 40 U.S.C. § 5104 (e)(2)(A), 40 U.S.C. § 5104 (e)(2)(D), and 40 U.S.C. § 5104 (e)(2)(G). A preliminary hearing is currently set for 20th September, 2022.
2. The parties are engaging in plea negotiations. These negotiations are at a preliminary stage, but are of such that the defence is no longer retaining the right to a preliminary hearing and waives the right to this hearing. Conversion to a status date would allow for the filing of the Information and subsequent transfer to the criminal calendar and negotiations to continue.
3. The defense agrees that the time limits mandated by 18 U.S.C. § 3161 would be tolled for the period the currently scheduled status hearing and any future date on the criminal

calendar should the Court vacate the current date and transfer the case to the criminal calendar.

WHEREFORE, for the above reasons, the parties respectfully request that this Court grant this Motion for to Convert the Preliminary Hearing of the above-captioned proceeding.

Respectfully Submitted,

/s/ Peter A. Cooper

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Joint Motion to Continue and to Exclude Time Under the Speedy Time Act is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 16th day of September, 2022.

/s/ Peter A. Cooper

Peter A. Cooper

