

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 22-mj-128 (ZMF)
	:	
TRACI ISAACS and LESLIE GRAY,	:	
	:	
Defendants.	:	

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

The United States, through undersigned counsel, hereby files this motion to adjourn the preliminary and status hearing set for Thursday, September 1, 2022, in the above-captioned matter, for approximately 60 days, until Tuesday, November 1, 2022. Defense counsel for both defendants concur in this motion. The parties request the additional time to review preliminary discovery productions and engage in possible plea negotiations.

The parties further request that the Court exclude the time until the status conference on November 1, 2022, 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 indictment and 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 Number 481052

By: /s/ Samuel S. Dalke  
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CERTIFICATE OF SERVICE

On this 24th 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/ Samuel S. Dalke  
SAMUEL S. DALKE  
Assistant United States Attorney – Detailee