

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 1:22-mj-150-2 (GMH)
	:	
COUNTRY CRAMER	:	
	:	
Defendant.	:	

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

The United States of America hereby moves this Court vacate the September 27, 2022 preliminary hearing scheduled in the above-captioned matter, and set a status conference in 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, and the parties are engaging in plea negotiations in this matter. The undersigned counsel is authorized to state that the counsel for the defendant has agreed to continue the status hearing set for September 27, 2022 in this case and agrees that a status conference should be set in its place in 30 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 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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