

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

UNITED STATES

*

v.

*

22-cr-00171-JMC

STACY LEE BOND

*

UNOPPOSED MOTION TO CONTINUE STATUS

Comes now the Defendant, through undersigned counsel, and moves this court to continue the status currently set for August 16, 2022. Defendant states the following in support thereof:

1. The government recently extended a plea offer in this matter. The Defendant is still considering that plea offer.
2. The Defendant requests more time to consider the plea offer and, should he accept it, to get his affairs in order in case this Court were to include a period of executed incarceration as part of the sentence. Upon information and belief, some similarly situated defendants have received probationary dispositions and some have received periods of executed incarceration at sentencing.
3. Additionally, the government has informed undersigned counsel that a walk-through is scheduled at the Capitol Building on Saturday, August 27, as part of the discovery process. Undersigned counsel is scheduled to attend that walk-through with his investigator as part of the discovery process.
4. The viewing letter for the walk-through was extended to counsel last Wednesday and the plea offer was extended last Tuesday.
5. Obviously Mr. Bond and undersigned counsel do not expect the court to rule on this motion in advance of the hearing tomorrow but make this request in advance of the hearing to

put the court on notice that we will be asking for an additional status. Mr. Bond will appear with counsel via Zoom at 2pm tomorrow.

6. The Defendant consents to toll the time between the August 16 status and the following status or other date set by the court under the Speedy Trial Act and this Court's Speedy Trial Plan.
7. The government, through AUSA Mona Furst, does not oppose the relief sought here.

MEMORANDUM OF POINTS AND AUTHORITIES

8. Sections 7(b), 8(g)(1) and (2), 13(d) of this Court's Speedy Trial Plan;
9. Local Criminal Rule 45.1;
10. 18 USC § 3161(h)(7).

Respectfully Submitted,

/s/ Joseph W. Fay
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CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2022, a copy of the foregoing was served upon the Assistant United States Attorney assigned to this matter, Mona Lee M. Furst, by email at Mona.Furst@usdoj.gov.

/s/ Joseph W. Fay
Joseph W. Fay