IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
v.)
) CRIM NO. 22-MJ-69
JERRY BRAUN,)
) Judge: Faruqui
)
Defendant.) Status Date: July 11, 2023

DEFENDANT JERRY BRAUN'S UNOPPOSED MOTION TO CONTINUE STATUS HEARING

COMES NOW Jerry Braun, through undersigned counsel, and requests a continuance of the status hearing scheduled for July 11, 2023, stating as follows:

- 1. Defendant has a status hearing scheduled for July 11, 2023.
- 2. The parties are still in the process of negotiating a potential plea in this matter. Furthermore, assigned government counsel is currently on extended leave. Therefore, the defense seeks to continue the status date in this matter.
- 3. Prior to the filing of this motion, undersigned counsel has communicated with government counsel, AUSA Kyle McWaters. The government does not oppose this motion. After joint coordination of the parties and the court, it appears that all parties are available to have this matter rescheduled for August 30, 2023. If the court is not available on that date, then the parties are available August 31, 2023, or September 1, 2023.

4. Undersigned counsel has spoken to defendant Braun and he is willing to toll the time under the Speedy Trial Act between July 11, 2023, and August 30, 2023

WHEREFORE, the defendant requests the court to vacate the current status date of July 11, 2023, and to set a new status date of August 30, 2023, or whatever date is convenient for the court.

Respectfully submitted,

JERRY BRAUN By Counsel

/s/ John L. Machado

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Certificate of Service

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 10th day of July, 2023, which will send a notification of such filing (NEF) to the following to all counsel of record.

/s/John L. Machado

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