## Case 1:22-cr-00089-ZMF Document 22 Filed 08/31/22 Page 1 of 2

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America	)	
	)	
v.	)	USDC No. 22-cr-89(APM)
	)	
Nancy Barron, defendant.	)	

## UNOPPOSED MOTION TO CONTINUE STATUS HEARING

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., ("counsel") appointed by this Court under the Criminal Justice Act, moves the Court, with no opposition from the United States, to continue the status hearing from September 23, 2022 at 11:30 a.m. to October 7 at 1 o'clock p.m., a date cleared with the Court's courtroom deputy, because of counsel's unavailability due to out-of-town travel from Sept. 23 through 28, 2022. The September 23rd hearing had previously been set when the Court granted defendant's Unopposed Motion to Continue Status Hearing ("Motion") filed Aug. 17, 2022 (ECF Doc. 20)

2. The defendant waives, with no opposition from the government, the tolling of time between September 23 and October 7, 2022, under the Speedy Trial Act. The defendant and government believe it will serve the interests of justice, as well as conserve the resources of the Court. The parties had previously waived the intervening time (from August 25 to Sept. 23, 2022) in the above-noted Motion.

3. The parties request that the next hearing be conducted remotely by video teleconference, as permitted by the CARES Act and the standing order of Chief Judge Howell.

A proposed Order is attached.

WHEREFORE, the defendant respectfully moves the Court to grant said relief.

This pleading is,

Respectfully submitted,

/s/

NATHAN I. SILVER, II Unified Bar #944314 6300 Orchid Drive Bethesda, MD 20817 (301) 229-0189 (direct) (301) 229-3625 (fax) email: <u>nisquire@aol.co</u>m

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Justin Woodard, Esq., U.S. Dept. of Justice (CRM), attorney of record for the government in the instant case, this 31st day of August, 2022.

/s/

Nathan I. Silver, II