

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA,

Plaintiff,

v.

CHAD HEATHCOTE,

Defendant.

No. 1:22-cr-232-CJN

**UNRESISTED  
MOTION TO CONTINUE  
STATUS CONFERENCE**

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COMES NOW defendant, through undersigned counsel, and moves for a three-week continuance of the status conference set in this case for September 8, 2022. In support, counsel states:

1. On July 15, 2022, at the arraignment of Mr. Heathcote on the four-count information in this case, the Court set a status conference for September 8, 2022.
2. Since then, defense counsel and counsel for the United States Attorney's Office have been in contact a number of times regarding possibly resolving this case short of trial. Defense counsel and counsel for the United States Attorney's Office mutually believe they are making meaningful progress to resolve this case.
3. Additional time is needed, however, because defense counsel is beginning a period of paternity leave starting August 13 and continuing until September 9, 2022.<sup>1</sup> Defense counsel had hoped to confer with Mr. Heathcote sufficiently regarding possible resolution of this matter before starting this leave, but given ongoing discussions between defense counsel and the United States Attorney's Office, and counsel's schedule, he has not yet been able to sufficiently

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<sup>1</sup> Defense counsel had anticipated appearing at the September 8, 2022, status conference by video despite being on leave.

confer with Mr. Heathcote and he does not believe he will be able to sufficiently confer with Mr. Heathcote prior to September 8, 2022.

4. On behalf of Mr. Heathcote, defense counsel requests that the Court continue the status conference by three weeks, to the end of September. That should provide time for defense counsel to confer with Mr. Heathcote sufficiently, once defense counsel has returned from leave.

5. Because the interest in allowing the parties additional time to try to resolve this matter short of trial outweighs the public interest in a speedy trial at this juncture, defense counsel also requests that the speedy trial clock be tolled pending the next conference date.

6. The government does not oppose this motion.

WHEREFORE, the undersigned requests that the September 8, 2022, status conference be continued for three weeks to the end of September.

/s/ Andrew Graeve

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CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2022, I electronically filed this document with the Clerk of Court using the ECF system which will serve it on the appropriate parties.

/s/ Theresa McClure