

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 1:22-cr-00166-BAH
	:	
JOHN GEORGE TODD III,	:	
	:	
	:	
Defendant.	:	

UNOPPOSED MOTION TO CONTINUE STATUS HEARING

Defendant, through undersigned counsel John M. Pierce, moves the Court, with no opposition from the United States, to continue this status hearing from December 6, 2022, at 11:00 a.m., to a date convenient with the Court and parties. Defendant further, with no opposition from the United States, moves the court to toll the Speedy Trial Act, 18 U.S.C. § 3161, et seq., for the time between December 6 and the date convenient with the Court and parties.

1. On November 15, 2022, Honorable Magistrate Judge Upadhyaya ordered the parties to appear for a status hearing on December 6, 2022, at 11:00 a.m.
2. During the week of November 28, 2022, undersigned counsel, John M. Pierce, was informed that he requires emergency oral surgery that was immediately scheduled for December 6, 2022.
3. Mr. Pierce’s surgeon requires him to undergo at least one full day of recovery following the surgery.
4. Because Mr. Pierce will be undergoing surgery and will therefore be unavailable to attend the status conference on December 6, 2022, Defendant respectfully requests that this Court continue the status hearing to a date convenient with the Court and parties.

5. Defendant waives, and the government does not oppose the waiver, the time between December 6 and the next court date, should the Court grant the continuance request. The defendant and government believe it would serve the interests of justice, as well as conserve the resources of the Court.

A proposed Order is attached.

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

Date: December 3, 2022

Respectfully Submitted,

/s/ John M. Pierce
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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on December 3, 2022, this motion and the accompany declaration was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce
John M. Pierce