

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

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
v.	:	<b>Case No. 1:22-CR-00267-DLF</b>
	:	
<b>JAMES ROBINSON,</b>	:	
<b>Defendant.</b>	:	

**UNOPPOSED MOTION FOR CONTINUANCE  
OF THE JANUARY 3, 2023 STATUS HEARING**

COMES NOW, Allen H. Orenberg, counsel for James Robinson,<sup>1</sup> and hereby respectfully requests the entry of an Order continuing the status hearing scheduled for January 3, 2023, (10:00 a.m.) to a date convenient to the Court and to the parties. As grounds, the following is stated:

1. This motion is unopposed by Assistant U.S. Attorney Barry K. Disney.
2. The parties are engaged in plea negotiations and expect to resolve this case by way of a pre-trial disposition. However, in light of the upcoming end-of-year holidays, additional time is needed to finalize the (misdemeanor) plea offer and for the government to generate the necessary plea documents.
3. It is respectfully suggested the court schedule a plea hearing (VTC) for sometime in the early February, 2023 – with consultation between the Deputy Clerk of Court and the parties.

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<sup>1</sup> Attorney Douglas Lee Dolfman will not be entering his appearance in this matter as counsel for Mr. Robinson. *See* Court Minute Entry, dated 10/20/2022.

4. Defendant, James Robinson, by and through counsel, hereby consents to a tolling of the Speedy Trial Act between January 3, 2023, and the next scheduled Court Hearing date. Furthermore, defendant James Robinson is requesting a “virtual” plea hearing and he will submit a written waiver of personal presence.

WHEREFORE, for the foregoing reasons and such other reasons which may appear just and proper, defendant James Robinson respectfully requests the entry of an Order continuing the status hearing scheduled for January 3, 2023, to a date convenient to the Court and to the parties.

Respectfully Submitted,

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