

and the Government's pretrial offer, the parties seek an additional continuance of approximately 60 days or another date thereafter at the Court's convenience. The additional time will afford defense counsel time to review and investigate any matters as needed and the parties time to discuss any possible pre-trial resolution of this matter.

WHEREFORE, the parties respectfully request that this Court grant the motion for an approximately 60-day continuance of the above-captioned proceeding, and that the Court exclude the time within which and Information, Indictment, or trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. §3161(h)(7)(A), (B)(i), (ii), and (iv), and failure to grant such a continuance would result in a miscarriage of justice.

Respectfully submitted,

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