

Counsel would have preferred to bring this to the attention of the Court earlier. Counsel does so now so the Court does not have to devote time to conducting a status hearing when this issue would have to be raised for the Court's consideration.

The defendant, along with the Government, is prepared to waive the time between June 22, 2023, and the next court date so that it may pursue and conclude plea negotiations, thus serving the interests of justice, and outweighing the interests of the public and the defendant in a speedy trial.

A proposed Order is attached.

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

This pleading is,

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on U.S. Ashley Akers, DOJ-CIV, 1100 L Street, N.W., Washington, D.C. 20530, attorney of record for the government, this 20th day of June, 2023.

/s/

Nathan I. Silver, II