UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)	
)	
V.)	USDC No. 22-cr-297 (TJK)
)	
Joshua Knowles, defendant)	

UNOPPOSED MOTIONS TO CONTINUE STATUS HEARING AND TO WAIVE TIME UNDER THE SPEEDY TRIAL ACT

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., ("counsel") appointed by this Court under the Criminal Justice Act, with no opposition from the United States, moves the Court to continue the in-person sentencing from June 22, 2023, at 11:00 a.m EST., for a period of approximately thirty (30) days. for the following reasons.

The Court previously continued the status hearing in this case from April 18, 2023, at the defendant's request. At the time, counsel was scheduled for hip replacement surgery on May 3, 2023. Counsel had the surgery, which was successful, but the recovery has been slower than expected and it has interfered with his ability to attend to this case. Also during the period of recovery counsel, with a work schedule limited, too, by doctor visits and physical therapy, has had several other matters which, for various reasons, commanded his attention.

Counsel consulted with his client the day of this filing in order to prepare for the status hearing set for two days hence. The defendant appears to be determined to resolve this case without a trial, and so has asked counsel to obtain a plea offer from the government. Counsel has contacted the government, which does not oppose this request and will provide a proposed Plea Agreement and Statement of Offense for the defendant's consideration. The parties believe that a continuance of thirty (30) days will be ample time in which to resolve the case.

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/

NATHAN I. SILVER, II Unified Bar #944314 6300 Orchid Drive Bethesda, MD 20817 (301) 229-0189 (direct) (301) 229-3625 (fax) email: nisquire@aol.com

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.

Nathan I. Silver, II