

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No.: 22-cr-297 (TJK)
	:	
JOSHUA KNOWLES	:	
	:	
Defendant.	:	

**CONSENT MOTION TO CONTINUE STATUS CONFERENCE
AND EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States, through undersigned counsel, hereby files this motion to continue the status conference set on July 20, 2023, in the above-captioned matter, for at least 45 days, until September 1, 2023. Defense counsel for Joshua Knowles consents to this motion. The United States requests the additional time because the parties need additional time to consider and discuss plea negotiations and continue to review discovery in conjunction with those discussions.

The government further requests – with the consent of the defendant – that the Court exclude the time between July 20, 2023 and the date of the status conference, pursuant to 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). Specifically, the time should be excluded based on the parties’ needs for more time to conduct plea negotiations, as well as review discovery.

As previously ordered, Minute Order (6/21/2023), if the parties wish to convert the next scheduled status conference to a change-of-plea hearing, the parties will submit the materials listed in the Court’s June 21, 2023 Minute Order to chambers in advance of the scheduled status conference.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Ashley Akers
ASHLEY AKERS
MO Bar No. 69609
Trial Attorney, Detailee
1100 L Street NW
Washington, DC 20005
(202) 353-0521
Ashley.Akers@usdoj.gov