IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
v.)
) CRIM NO. 22-CR-413
DOMINIC BOX,)
) Judge: Kollar-Kotelly
)
Defendant.) Status Date: March 10, 2023

DEFENDANT DOMINIC BOX CONSENT MOTION TO CONTINUE STATUS CONFERENCE

COMES NOW Dominic Box, through undersigned counsel, and requests a continuance of the hearing scheduled for March 10, 2023, with the consent of the government, stating as follows:

- Defendant is charged with four misdemeanor counts: 18 U.S.C. §
 1752(a)(1) and (2), and 40 U.S.C. §5104(e)(2)(D) and (G).
- This matter is currently scheduled for a status conference on March 10,
 2023.
- 3. The parties are currently in the process of negotiating a potential plea offer. In addition, defense counsel is still reviewing discovery with his client. In addition, undersigned counsel is currently in the last week of a jury trial before Judge Mehta that began at the beginning of February: <u>United States v. Sandra Parker et al.</u>, 21-CR-28.

4. Undersigned counsel has communicated with AUSA Samantha Miller, who indicates that the government does not oppose this motion.

5. The parties have discussed a new conference date, and, if it is rescheduled, the parties are available any day the weeks of April 10 and April 17, 2021, with the exception of April 11, 2023. If those dates do not work, the parties can find a date that is mutually available.

6. Defendant Dominic Box consents to the exclusion under the Speedy Trial Act of the time between March 10, 2023, and the new status date.

WHEREFORE, the defendant requests the court to vacate the current date of March 10, 2023, and to set a new status date the weeks of April 10, 2023, or April 17, 2023, or to any other date available to the parties and this Honorable Court, and for any other relief this court deems proper.

Respectfully submitted,

DOMINIC BOX By Counsel

/s/ John L. Machado

John L. Machado, Esq. Bar. No. 449961 Counsel for Dominic Box 503 D Street, N.W., Suite 310

Washington, DC 20001

Phone: (703) 989-0840

E-mail: johnlmachado@gmail.com

Certificate of Service

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 7th day of March, 2023, which will send a notification of such filing (NEF) to the following to all counsel of record.

/s/John L. Machado

John L. Machado, Esq.
Bar Number 449961
Attorney for Dominic Box
Office of John Machado
503 D Street NW, Suite 310
Washington, D.C. 20001
Telephone (703)989-0840

Email: johnlmachado@gmail.com