

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)	
)	
v.)	USDC No. 22-cr-297 (TJK)
)	
Joshua Knowles, <i>defendant</i>)	

UNOPPOSED MOTION 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 vacate the status hearing, set for 2:00 p.m. on Sept. 1, 2023, and reschedule it for the following reason.

Defendant’s counsel has a pre-existing obligation to care for his son’s children in the state of New York from August 28 through September 1, 2023. Counsel therefore does not expect to be available to appear for a videoconference hearing in the circumstances.

Defendant therefore seeks a brief continuance and advises the Court that his counsel would be available **except for** the following dates and times (all dates in September, 2023): 6 (morning); 12 (morning); 13 (afternoon); 19 (1-3 p.m.); 22 (afternoon), and 28 (from 9:30-11 a.m.).

Given that this represents a short continuance to accommodate counsel, the defendant waives the time, in the interests of justice, between Sept. 1, 2023 and the next court date.

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 Ashely Akers, Esq., U.S. Dept. of Justice (CIV), attorney of record for the government in the instant case, this 3rd day of August, 2023.

/s/

Nathan I. Silver, II