

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 continue the status hearing (by VTC) for a period no longer, if possible, than fourteen (14) days, consistent with the Court’s calendar, and to waive the intervening time under the Speedy Trial Act, for the following reasons.

Undersigned counsel hopes to attend the “March for Israel” rally on the National Mall on Tuesday, Nov. 14. It is scheduled from 1-3 p.m. It would not be possible for counsel to appear even by Zoom for the 2 p.m. status hearing now scheduled. Counsel has advised the defendant, who does not oppose this request.

The government kindly does not oppose this request which counsel makes for a discretionary personal reason. AUSA Ashley Akers advises counsel that she will be in trial during the week of November 13, 2023, so putting off the status hearing in this case will actually help her schedule.

For these reasons, the defendant requests that the status hearing be continued for no more than fourteen (14) days to accommodate counsel’s plans and the government’s availability.

In the circumstances, the interests of the public and the defendant in a speedy trial will not be prejudiced, given the short period of time of the proposed continuance. The defendant and government waive the running of time under the Speedy Trial Act between November 14, 2023, and the date of the next court hearing¹.

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 Ashley Akers, Esq., U.S. Dept. of Justice (CIV), 1100 L Street, N.W. Washington, D.C. 20530, attorney of record for the government in the instant case, this 13th day of November, 2023.

/s/

Nathan I. Silver, II

¹ The parties have discussed possible dates for further status. The defendant, who lives in the Pacific time zone three hours behind hours, is **not available before** 11:30 a.m. EST on Mondays and Wednesdays, o before 11:30 or before 10:30 a.m. EST on Tuesdays, Thursdays and Fridays before 10:30 a.m. EST. Counsel is **not** available the morning of Nov. 27 and from 12:00-2:00 pm on Nov. 30 (in-person hearing before Judge Lamberth with out-of-town client); and December 7, 8, 11-13, and the morning of Dec. 14.