

**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: May 5, 2023

**JOINT MOTION TO CONTINUE STATUS
CONFERENCE**

COMES NOW Dominic Box, through undersigned counsel, and the United States, through the United States Attorney’s Office and jointly request a continuance of the hearing scheduled for May 5, 2023, stating as follows:

1. 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).
2. This matter is currently scheduled for a status conference on May 5, 2023.
3. The parties are currently in the process of negotiating a potential plea offer, as no official plea offer has yet been offered by the government. In addition, undersigned counsel was provided with an additional round of case-specific discovery last week, which counsel has not had the opportunity to review yet or review with his client, as he has been in trial all of this week.
4. Given the current posture of the case, should the status hearing proceed this

week, the parties would have little to report on the progress of the case to the court.

5. Accordingly, the parties are jointly requesting that the court reschedule the status hearing for approximately thirty (30) days and would expect more progress to be made by that time in this matter.

6. The parties have discussed a new status conference date, and, if it is rescheduled, the parties are available the week of June 5, 2023. The parties would prefer either June 7 or 8, 2023. If the court schedules it for Friday June 9, 2023, the parties would request that it be set for after 11:00 a.m., but not at 2:00 p.m., as defense counsel has a sentencing before Judge Cooper at that time. If those dates do not work, the parties can find a date that is mutually available.

7. Defendant Dominic Box consents to the exclusion under the Speedy Trial Act of the time between May 5, 2023, and the new status date and, if requested by the court, will file a waiver indicating so with the court.

WHEREFORE, the defendant requests the court to vacate the current date of May 5, 2023, and to set a new status date the week of June 5, 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,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar Number 481052

DOMINIC BOX
By Counsel

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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 2nd day of May, 2023, which will send a notification of such filing (NEF) to the following to all counsel of record.

/s/John L. Machado
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