

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 22-cr-320 (JMC)
v.	:	
	:	
ANTONIO LAMOTTA,	:	
	:	
Defendant.	:	

**JOINT MOTION FOR CONTINUANCE OF TRIAL AND OTHER PRETRIAL
DEADLINES**

The United States of America, through its undersigned counsel, and the defendant, Antonio Lamotta, through his counsel, jointly ask the Court to continue the trial currently scheduled for August 14, 2023, until October 2023, or such time that the Court is available. The parties also ask that the Court reset the currently pending pretrial deadlines.

In the preceding weeks, as both the government and the defendant prepared for trial, the parties negotiated in good faith and attempted to reach a pretrial resolution of this matter. Although the parties believed that a pretrial resolution was possible, and in fact believed one was imminent, negotiations have fallen through, and it now appears that the parties will proceed to trial.

Although both government and defense counsel have been working diligently, both parties now request additional time to prepare for trial in light of the time lost to plea negotiations. Further, considering the competing trial obligations of undersigned counsel over the coming months, the parties believe that a trial in early October would best allow adequate trial preparation, subject to the Court’s availability.

The parties further agree that in the interest of justice, the time between August 14, 2023, and the new trial date be excluded from the time in which trial must commence in this matter under the Speedy Trial Act.

Respectfully submitted,

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