UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	**Case No. 1:22-cr-239-1**
	:	
DOUGLAS WYATT	:	
	:	
Defendant.	:	

CONSENT MOTION TO VACATE STATUS CONFERENCE,
CONTINUE CASE, AND EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT

The United States of America hereby moves this Court vacate the January 31, 2023 status conference scheduled in the above-captioned matter, and set a status conference in 60 days, and further to exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq*., on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). In support of its motion, the government states as follows:

The government has produced voluminous discovery to defendant Wyatt. Defense counsel has not had sufficient time to meet with his client to review discovery and discuss possible pretrial resolutions due to a trial preparations in other cases. The defendant needs more time to review the discovery production and engage in plea discussions.

The undersigned counsel is authorized to state that the counsel for the defendant has agreed to vacate the status conference set for January 31, 2023 in this case and agrees that a status conference should be set in its place in 60 days. Additionally, counsel for the defendant consents to the tolling of the Speedy Trial Act until the next status conference date.

WHEREFORE, the government respectfully requests that this Court grant the motion to vacate the scheduled status hearing, grant a 60-day continuance of the above-captioned proceeding, and that the Court exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq*., on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar Number 481052

By: */s/ Andrew J. Tessman*
ANDREW J. TESSMAN
Assistant United States Attorney
District of Columbia – Detailee
West Virginia Bar No. 13734
300 Virginia Street
Charleston, WV 25301
(304) 345-2200
Andrew.Tessman@usdoj.gov