

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

UNITED STATES OF AMERICA *

*

v.

*

DAVID MITCHELL BATES *

*

Case No. 24-00008 RC

*

Defendant. *

*

*

UNOPPOSED MOTION TO CONTINUE ARRAIGNMENT

The Defendant, David Mitchell Bates, by and through counsel, Nicholas G. Madiou, and Brennan, McKenna & Lawlor, Chtd., respectfully submits this Unopposed Motion to Continue Arraignment. In support of this Motion, counsel state as follows.

1. Per prior order of the Court, an arraignment is currently scheduled for today, January 19, 2024 at 11:00 a.m. in the above-referenced matter.

2. At this time, Mr. Bates respectfully requests a brief continuance of the arraignment in this matter. Counsel makes this request because of child care issues due to the inclement weather.

3. This Motion is unopposed. The undersigned counsel has conferred with Assistant United States Attorney Samuel White, who has indicated that the Government does not oppose the requested continuance.

4. Mr. Bates consents to the tolling of time under the Speedy Trial Act through the next hearing date in this matter.

5. Given counsel's calendar, the undersigned counsel respectfully request that the Court's courtroom deputy clerk clear an arraignment date with the parties.

6. Accordingly, Mr. Bates respectfully requests that this Honorable Court continue the arraignment in this matter to a date that is convenient for the Court and the parties.

Respectfully submitted,

/s/

December 18, 2023

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 19, 2024, a copy of the foregoing was sent to the United States Attorney's Office for the District of Columbia, via ECF.

/s/

Nicholas G. Madiou