

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
V.	:	CASE NO. 23-CR-143
	:	
MICHAEL DANIELE,	:	
	:	
DEFENDANT.	:	

**CONSENT MOTION TO CONTINUE CHANGE OF PLEA HEARING AND EXCLUDE
TIME UNDER THE SPEEDY TRIAL ACT**

The United States, through undersigned counsel, hereby files this motion to continue the Change of Plea Hearing set for Wednesday, November 8, 2023, in the above-captioned matter to January 5, 2024 at 2PM EST. Counsel for defendant concurs in this motion. This case had been set for a Change of Plea Hearing; however, during the Change of Plea Hearing an issue arose regarding the plea and this issue will not be able to be resolved this afternoon. The parties are requesting that this case be set for a status conference, via Zoom, for January 5, 2024 at 2PM EST.

The parties request that the Court exclude the time from November 8, 2023, until January 5, 2024, pursuant to 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).

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar No. 481052

Date: November 8, 2023

By: /s/ Holly Grosshans
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