

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 23-cr-220 (TJK)
	:	
BRANDON BRADSHAW,	:	
	:	
	:	
Defendant.	:	

**UNOPPOSED MOTION TO CONTINUE AND EXCLUDE
TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America hereby moves this Court for a 30-day continuance of the September 8, 2023 status conference scheduled in the above-captioned matter, and further to exclude the intervening time under the Speedy Trial Act. In support of its motion, the government represents:

1. On July 24, 2023, this Court held an arraignment and status conference in this matter.
2. The Court scheduled a status hearing for September 8, 2023, with the hope that by then, defense counsel would have filed a notice of appearance and had the chance to receive and review discovery.
3. On September 6, 2023, defense counsel informed the government that the defendant was in the process of hiring local counsel.
4. As of today, September 7, 2023, no defense attorney has filed an appearance in this case.
5. The government sent the defendant's current defense attorney a plea offer on July 18, 2023. The government is prepared to disclose all discovery in this matter as soon as a notice of appearance is filed.

6. Government counsel believes it is in the interest of justice to toll the Speedy Trial Act while we wait for defense counsel to file their notice of appearance. The government thus requests a tolling of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)A), based on the factors described in 18 U.S.C. § 3161(h)(7)(B)(i), (ii), and (iv).
7. Therefore, the government requests that the September 8, 2023 status conference be continued for approximately 30 days, and that there is an exclusion of time under the Speedy Trial Act from September 8, 2023 through the next scheduled status conference. The defendant does not oppose this request.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

By: /s/ Madison H. Mumma
Madison H. Mumma Trial
Attorney (Detailee)
N.C. Bar No. 56546 601
D. St NW
Washington, DC 20001
202-431-8603
Madison.mumma2@usdoj.gov