

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES of AMERICA)
)
 vs.) No. 23-cr-435-RBW
)
MICHEAL BRADLEY,)
)
 Defendant.)

**DEFENDANT’S MOTION CONSENT TO CONTINUE
STATUS CONFERENCE AND REQUEST FOR TRIAL DATE**

Defendant Micheal Bradley, through undersigned counsel, respectfully moves the Court for an order continuing for 30 days the status hearing now scheduled for January 18, 2024. Defendant consents to exclude from calculation under the Speedy Trial Act the time between January 18, 2024, and the date of the rescheduled status hearing.

At the status conference on January 5, 2024, the Court proposed a trial date of April 22, 2024. As counsel informed the Court at that time, Defendant’s daughter was murdered in 2022. Her killer is awaiting trial in Georgia state court. A status conference scheduled in that matter for January 12, 2024, was postponed because of inclement weather, and has not yet been rescheduled.

Defendant respectfully requests that his trial be scheduled after the trial of his daughter’s killer, so that he may be present for that trial to support his family, and so that he may devote all of his attention and energy to preparing for his own trial. To accomplish that, Defendant respectfully requests that his trial be scheduled for the first quarter of 2025.

In suggesting the April 2024 trial date, the Court noted that January 6th cases “are getting old.” However, Defendant was not arrested until September 2023, and not indicted

until December 2023. Thus, a trial in April 2024 would give the Defendant only a few months to prepare, which is far less than the norm in January 6th and other cases.

Counsel for the United States has authorized undersigned counsel to represent to the Court that the United States consents to Defendant's request to continue the status conference, but does not consent to scheduling the trial in 2025.

Date: January 14, 2024

Respectfully submitted,

/s/ Paul F. Enzinna

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Counsel for Defendant Micheal Bradley

CERTIFICATE OF SERVICE

I certify that on January 14, 2024, a copy of the foregoing Defendant's Motion to Continue Status Conference and Request for Trial Date was filed using the CM/ECF system, which will then send notification of such filing to all counsel of record.

Respectfully submitted,

_____/s/_____

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