

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

UNITED STATES OF AMERICA :
 :
 V. : **CASE NO. 23-MJ-00195**
 :
 TONYA BISHOP, :
 :
 DEFENDANT. :

**CONSENT MOTION TO CONTINUE STATUS CONFERENCE AND EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT**

The United States, through undersigned counsel, hereby files this motion to adjourn the status conference set for Tuesday, October 31, 2023, in the above-captioned matter until Thursday, November 30, 2023. Counsel for defendant concurs in this motion. The government has continued to make pre-indictment discovery productions, and counsel for defendant advised that he continues to review these pre-indictment discovery productions. Additionally, the parties have been in discussions about a possible pre-indictment plea in this case, and counsel for defendant requests additional time to fully discuss the discovery and possible resolution with his client.

The parties request that the Court exclude the time from October 31, 2023, until the next status conference, 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: October 25, 2023,

By: /s/ Holly Grosshans
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