

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

Criminal Case No. 21-cr-00165-RM

UNITED STATES OF AMERICA

Plaintiff,

v.

2. CHANDLER SIMBECK,

Defendant.

**NOTICE ADOPTING PRIOR MOTION TO EXCLUDE 180 DAYS FROM THE
REQUIREMENTS OF THE SPEEDY TRIAL ACT [Doc. 32]**

COMES NOW, Defendant Chandler Simbeck, through counsel, and submits this Notice Adopting Prior Motion to Exclude 180 Days From the Requirements of the Speedy Trial Act [Doc. 32].

Procedural History and Ends-of-Justice-Continuance Expiration Date

Speedy trial in Mr. Simbeck's case was set to run on January 31, 2022. [Doc. 18.] On December 7, 2021, Mr. Simbeck's previous attorney, Luis Castaneda filed an Unopposed Motion to exclude 180 days from speedy trial calculation. [Doc. 32.] That same day, a pretrial release warrant was issued for for Simbeck, and speedy was tolled. [Doc. 36.] At that point in time, 55 days remained on speedy. On December 13, 2021, the

Court granted Mr. Castaneda's motion. [Doc. 38.] The 70-day clock, exclusive of tolled time, was extended from January 28, 2022 to July 27, 2022. *Id.* Since the warrant was issued, the next time Mr. Simbeck appeared in front of Judge Moore was on September 29, 2022, which untolled speedy. [Doc. 93.]

Defendant Simbeck submits this notice to the Court endorsing and adopting the prior ends-of-justice request made by Mr. Castaneda. Accordingly, Mr. Simbeck's ends of justice continuance should expire on May 22, 2023.

Respectfully submitted this October 13, 2022.

TYRONE GLOVER LAW, LLC

s/ Tyrone Glover

Tyrone Glover #41529

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CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2022 a true and correct copy of the foregoing **NOTICE ADOPTING PRIOR MOTION TO EXCLUDE 180 DAYS FROM THE REQUIREMENTS OF THE SPEEDY TRIAL ACT** was served via ECF/Pacer to the parties of record.

TYRONE GLOVER LAW, LLC

s/ Tyrone Glover

Tyrone Glover