

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

|                          |   |                       |
|--------------------------|---|-----------------------|
| UNITED STATES OF AMERICA | : |                       |
|                          | : |                       |
| v.                       | : | No. 1:20-mj-00034-LDA |
|                          | : |                       |
| DAVID ADLER STAVELEY     | : |                       |

**DEFENDANT'S UNOPPOSED MOTION TO CONTINUE PRELIMINARY HEARING**

Defendant David Adler Staveley respectfully submits this Unopposed Motion to Continue the Preliminary Hearing currently scheduled for August 26, 2020. Mr. Staveley seeks this continuance because his current lead counsel has not determined whether he is able to represent Mr. Staveley going forward, but counsel expects to make a final decision this week. For this reason, counsel has not met with Mr. Staveley regarding the Preliminary Hearing, nor has he prepared for it. The Government's attorney informed undersigned counsel that the Government does not object to this Motion.

Undersigned counsel represented Mr. Staveley intermittently in the past and had agreed to represent him when Mr. Staveley became aware of the charges in this matter. As the Court is aware, unusual circumstances ensued over the past three months, and counsel for a period of time did not believe that his representation would be necessary. After Mr. Staveley was arrested in Georgia, counsel communicated with Mr. Staveley's family, and it became unlikely that counsel would be compensated for representation now or in the future. That circumstance recently changed, however, and counsel is reconsidering whether he will continue to represent Mr. Staveley in this proceeding. Counsel should make a final decision by the end of this week or at the latest by Monday, August 31.

Mr. Staveley accordingly requests a continuance of approximately twenty (20) days for the preliminary hearing and respectfully requests that this Motion be granted.

Respectfully submitted,

David Adler Staveley

By his attorney,

Dated: August 25, 2020

/s/ Mark L. Josephs

Mark L. Josephs

Bar No. 568454

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to anyone indicated as a non-registered participant on August 25, 2020.

/s/ Mark L. Josephs  
Mark L. Josephs