UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-MJ-8393-WM

UNITED STATES OF AMERICA

vs.

GREGORY SCOTT KEOUGH,

Defendant.
_____/

UNOPPOSED MOTION FOR EXTENSION OF TIME TO INDICT

The United States of America and Gregory Scott Keough, through their respective undersigned counsel, hereby move the Court to enter an order under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), excluding the time that elapses from August 23, 2023 to August 25, 2023, from calculation of the deadlines set forth in the Act and extending the date by which this matter must be indicted. In support of this motion, the parties state the following:

The extension of time to indictment from August 23, 2023 to August 25, 2023, is filed on the grounds that the parties wish to have an additional period of time in which to engage in pre-trial discussion relating to pre-trial detention and/or bond or an alternate resolution to this case.

The defendant, through counsel, waives his right to a speedy indictment and agrees that the time from August 23, 2023 to August 25, 2023, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), from calculation of the deadlines set forth in the Act, and waives his rights under the Act for that requested period of exclusion. The interest of justice to be served by the requested exclusion of time outweigh the interest of the defendant and the public in a speedy trial because the charges herein are very serious and the potential to resolve the case by agreement would promote a speedy and certain outcome of the case.

The undersigned Assistant United States Attorney has conferred with David Joffe, counsel to Defendant Gregory Scott Keough, who does not object to this filing.

WHEREFORE, the parties respectfully request that the Court enter an Order excluding the period of time from August 23, 2023 to August 25, 2023, should be excluded from calculation under the provisions of the Speedy Trial Act.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

/s/ *Robin W. Waugh*
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CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2023, the undersigned electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ *Robin W. Waugh*
ROBIN W. WAUGH
Assistant United States Attorney