UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA **v.** **NICHOLAS MILANO WHITE,** **Defendant**	**CASE NO. 20-MJ-1563-CBD**

JOINT MOTION TO EXTEND TIME LIMIT UNDER
FEDERAL RULE OF CRIMINAL PROCEDURE 5.1(c)

Come now the United States of America, by and through undersigned counsel, and the defendant Nicholas Milano White (the "Defendant"), through undersigned counsel, and jointly move for an Order extending the time limit under Rule 5.1(c) of the Federal Rules of Criminal Procedure to conduct a preliminary hearing in this matter.

1. On June 19, 2020, the Honorable Charles B. Day, United States Magistrate Judge, signed a Criminal Complaint charging the Defendant with Conspiracy and Theft of Mail Matter in violation of 18 U.S.C. §§ 371 and 1708, respectively, and a warrant for the arrest of the Defendant.

2. The Defendant was arrested on June 24, 2020, and made his initial appearance on June 25, 2020.

3. Following a detention hearing on June 24, 2020, the Honorable Beth P. Gesner, Chief United States Magistrate Judge, ordered the detention of the Defendant pending trial.

4. Pursuant to Federal Rule of Criminal Procedure 5.1(c), a magistrate judge must hold a preliminary hearing no later than 14 days after the initial appearance if the defendant is in custody; however, a magistrate judge may extend this time limit "[w]ith the defendant's consent and upon a showing of good cause[.]" Fed. R. Crim. P. 5.1(d).

5. Due to limitations in the availability of counsel for the parties and the Court, a preliminary hearing in this matter cannot be scheduled on or before July 9, 2020. The parties have

agreed to conduct the hearing one day later, on July 10, 2020, and have confirmed the Court's availability on that date.

6. The parties agree that the aforementioned facts establish "good cause" for postponement of the preliminary hearing, "taking into account the public interest in the prompt disposition of criminal cases[.]" Fed. R. Crim. P. 5.1(d).

Wherefore, the parties respectfully request that the Court enter an Order extending the time for holding a preliminary hearing under Fed. R. Crim. P. 5.1(c) to July 10, 2020, and that the Court further order that this extension of time is justified by the Defendant's consent and by a showing of good cause.

Respectfully Submitted,

Robert K. Hur
United States Attorney

By: /s/
Matthew J. Maddox
Assistant United States Attorney

Counsel for the Defendant

/s/
Robert C. Bonsib, Esq.