IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

| UNITED STATES OF AMERICA | § | |
|--------------------------|---|-----------------|
| | § | |
| v. | § | |
| | § | No. 4:21-cr-588 |
| ANTHONY HUTCHISON | § | |
| and BRIAN BUSBY, | § | |
| Defendants. | § | |

DEFENDANTS' JOINT UNOPPOSED MOTION FOR CONTINUANCE

Defendant Anthony Hutchison moves, jointly with Defendant Brian Busby, for an eight (8) month continuance of the motions deadline, pretrial conference, and trial, and respectfully shows as follows:

Mr. Hutchison was originally charged with bribery concerning programs receiving federal funds, wire fraud, and witness tampering. The indictment was superseded on April 7, 2022, and Mr. Hutchison was additionally charged with filing false tax returns.

Discovery in this case is extremely voluminous, amounting to around five (5) terabytes of data. The case involves allegations of conduct that occurred over a period of more than ten years. The case has been certified as complex. Undersigned defense counsel needs more time to review discovery, investigate the case, file pretrial motions, and to prepare for trial. Defendant Brian Busby joins in this motion.

Defendants respectfully submit that the best interests of justice served by granting this motion for continuance substantially outweigh Defendants' interest and the interest of the community in a speedy trial. Failure to grant a continuance would deprive defense counsel of sufficient time to prepare for trial.

The government is unopposed to this motion for continuance.

Respectfully submitted,

By: /s/ Russell Hardin, Jr.
Russell Hardin, Jr.
Attorney-in-Charge
Federal I.D. No. 19424
Texas State Bar No. 08972800

OF COUNSEL:

RUSTY HARDIN & ASSOCIATES, LLP Letitia D. Quinones State Bar No. 24008433 Federal I.D. No. 23722 John MacVane Federal I.D. No. 2209776 State Bar No. 24085444 Aisha Dennis Federal I.D. No. 3290460 State Bar No. 24128655 1401 McKinney Street, Suite 2250

Houston, Texas 77010 Telephone: (713) 652-9000 Facsimile: (713) 652-9800

Email: rhardin@rustyhardin.com

Email: letitia@quinonesandassociates.com

Email: jmacvane@rustyhardin.com Email: adennis@rustyhardin.com

Attorneys for Anthony Hutchison

CERTIFICATE OF CONFERENCE

I certify that counsel for Defendant Anthony Huchison conferred with AUSA Robert Johnson, and determined that the United States is unopposed to this motion for continuance. In addition counsel for Defendant Brian Busby's join in this motion and requests that this continuance apply to his client as well.

/s/ John MacVane
John MacVane

CERTIFICATE OF SERVICE

I certify that February 3, 2023, a copy of the foregoing Joint, Unopposed Motion for Continuance was served by Notification of Electronic Filing to the parties of record.

/s/ John MacVane
John MacVane