



3. To accommodate each other's respective schedules, counsel for both Parties have consented to continuing the arraignment until the week of September 8, 2008, or as soon thereafter as is convenient for the Court.

4. The parties have negotiated a proposed plea agreement, under which they anticipate that Mr. Briggs will plead guilty to a one-count information charging receipt of child pornography in violation of 18 U.S.C. § 2252A(a)(2). In the proposed plea agreement, the parties have agreed on an appropriate sentence under Rule 11(c)(1)(C) of the Federal Rules of Criminal Procedure. Because the parties have agreed upon an appropriate proposed sentence, Mr. Briggs intends, should the Court accept the plea agreement, to request imposition of the sentence under Rule 11(c)(1)(C) at the time of acceptance. The Government does not oppose this request.

5. To enable the Court to consider and accept the proposed plea agreement without delay and to impose sentence upon acceptance, Mr. Briggs respectfully requests, without Government opposition, that the arraignment and plea be set before the Honorable District Judge Kollar-Kotelly.

6. For points and authorities in support of this unopposed motion, Mr. Briggs relies upon Rules 2, 7(b), 10 and 11 of the Federal Rules of Criminal Procedure; Local Criminal Rule 47, and the Court's inherent authority over its docket.

WHEREFORE, Mr. Briggs respectfully requests that the Court set the arraignment and plea for the week of September 8, 2008, or as soon thereafter as is convenient for the Court, before the Honorable District Judge Kollar-Kotelly.

Respectfully submitted,

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