

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA :
 :
 v. : CRIMINAL NO. 1-21-cr-00567-(RCL)
 :
 CHARLES SMITH :
 :
 _____ :
 :

**JOINT MOTION TO CONTINUE STATUS HEARING
AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The parties hereby move this Court to continue the scheduled status hearing in the above-captioned proceeding, and further to exclude the time under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161. In support of this motion, the parties state as follows:

1. Mr Smith is before the Court charged by Indictment with one count each of violating: 18 U.S.C. § 1512(k); 18 U.S.C. §§ 1512(c)(2) and 2; 18 U.S.C. §231(a)(3); 18 U.S.C. §§111(a)(1) and (b), and 2; 18 U.S.C. § 1752(a)(1) and (b)(1)(A); 18 U.S.C. § 1752(a)(2); 18 U.S.C. § 1752(a)(3) and 2; 18 U.S.C. 1752 (a)(4) and (b)(1)(A), and 2; 40 U.S.C. §5104(e)(2)(D); 40 U.S.C. §§5104(e)(2)(E), and 2; 40 U.S.C. §5104(e)(2)(F); and 40 U.S.C. §5104(e)(2)(G). A hearing is currently set for Thursday, 9 June, 2022.
2. The parties are engaged in advanced plea negotiations. Negotiations have been fruitful but are still ongoing, and while the parties are optimistic at a resolution, this will not be finalized for the upcoming status date. The parties envisage a short two-week extension of time should be adequate to complete an agreement.

3. The parties have discussed a new hearing date. The parties are available 21st (after 3pm), or 23rd or 24th June anytime in the afternoon, should the Court have an opening convenient to the Court.
4. The defense agrees that the time limits mandated by 18 U.S.C. § 3161 should be tolled for the period between the continued status hearing and the date agreed upon for the next hearing.

WHEREFORE, for the above reasons, the parties respectfully request that this Court grant this Motion to Continue Status Hearing in the above-captioned proceeding.

Respectfully Submitted,

/s/ Peter A. Cooper

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Joint Motion to Continue Status Hearing and to Exclude Time Under the Speedy Time Act is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 8th day of June, 2022.

/s/ Peter A. Cooper

Peter A. Cooper

