

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANEAN MACANDREW

Defendant.

Case No. 1:21-CR-730-CKK

UNOPOSED MOTION TO CONTINUE STATUS CONFERENCE

Defendant Danean MacAndrew hereby requests that this Court continue the upcoming status conference, currently set for 1:30 p.m. Eastern Time on May 18, 2022, to 1:30 p.m. Eastern Time on June 13, 14, or 15, 2022, or as soon thereafter as the Court is available. The government does not oppose this request. *See* Chu Decl. ¶ 3. Ms. MacAndrew waives time from May 18, 2022, until the new status conference date and agrees that this time period will be excluded from the time within which trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et. seq.*

Good cause exists for this request due to defense counsel's current inability to appear with her client via VTC at the upcoming status conference. *See* Chu Decl. ¶ 2. Defense counsel's office has an unusually high number of COVID-19 positives and is currently limiting the number of individuals physically in the office. *Id.* Additionally, defense counsel currently has cold symptoms. *Id.* Per her office's current policies, defense counsel cannot appear together with her client from the office on the current status conference date. *Id.*

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For these reasons, the defense requests that the Court reset the status conference to 1:30 p.m. on June 13, 14, or 15, 2022, or as soon thereafter as the Court is available.

Respectfully submitted,

CUAUHTEMOC ORTEGA
Federal Public Defender

DATED: May 16, 2022

By */s/ Lillian Chu*

LILLIAN CHU
Deputy Federal Public Defender
Attorney for DANEAN MACANDREW

DECLARATION OF LILLIAN CHU

I, Lillian Chu, hereby declare:

1. I am a Deputy Federal Public Defender in the Office of the Federal Public Defender for the Central District of California and attorney of record in the above-captioned matter. I am admitted to practice law in the State of California and before this Court.

2. Multiple individuals in my office have tested positive for COVID-19 over the last five days. My office has been instructed to work remotely for the week of May 16, 2022, with only a skeleton staff physically in the office. On May 16, 2022, I was informed that I was exposed to COVID-19 on May 13, 2022, while in my office. On the morning of May 16, 2022, I developed cold symptoms. Although I have not tested positive for COVID-19, my office policy is that I will not be allowed to return to the office until my symptoms abate and I test negative for COVID-19 five to seven days after my exposure. For this

3. reason, I will not be able to appear together with my client from my office by VTC during the currently scheduled status conference on May 18, 2022.

4. On May 16, 2022, I emailed with AUSA Joseph DeGaetano and informed him of my intention to make this request. He indicated to me that he did not oppose this request and would be available during the currently requested dates.

By

/s/ Lillian Chu

Lillian Chu
Deputy Federal Public Defender