

UNITED STATES DISTRICT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
)
 v.) Case No. 1:21-cr-00303-ABJ-2
)
 DEBORAH LEE,)
)
 Defendant.)

**DEFENDANT’S UNOPPOSED MOTION TO EXTEND TIME
TO FILE PRETRIAL MOTION AND RESPONSES,
TOLLING SPEEDY TRIAL AND SETTING STATUS CONFERENCE**

NOW comes Defendant Deborah Lee, by and through her counsel of record, John M. Pierce, Esq., respectfully requests this Honorable Court to extend the time for Defendant and the UNITED STATES to file pre-trial motions/responses; toll speedy trial; and a set status conference and says:

1. The parties, through counsel, have met and conferred regarding the substance of this motion and relief requested, and agree and consent to the entry of an order granting the following relief:
 - a) Defendant shall have until June 13, 2022 to file pretrial motions; the AUSA shall have until July 5, 2022 to file responses thereto.
 - b) Speedy trial shall be tolled under the Speedy Trial Act up to the new deadline for motions.
 - c) The Court shall set a Status Conference before Judge Jackson to address prospective trial dates and other pertinent matters.

Dated: June 1, 2022

Respectfully Submitted,

/s/ John M. Pierce

John M. Pierce

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CERTIFICATE OF SERVICE

I, John M. Pierce, hereby certify that on this day, June 1, 2022, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce
John M. Pierce